

**Deadline to Object: October 2, 2024, at 4:30 p.m. (Eastern Time)**

**Hearing Date: October 9, 2024, at 11:00 a.m. (Eastern Time)**

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*Counsel for the Debtors*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

Chapter 11

MERCON B.V.,<sup>1</sup>

Case No. 23-11947 (MEW)

Debtors.

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**SUMMARY SHEET FOR SECOND INTERIM AND FINAL APPLICATION OF  
BAKER & MCKENZIE LLP AS ATTORNEYS FOR DEBTORS FOR ALLOWANCE  
AND PAYMENT OF COMPENSATION FOR PROFESSIONAL SERVICES  
RENDERED AND REIMBURSEMENT OF ACTUAL AND NECESSARY EXPENSES  
INCURRED FROM DECEMBER 6, 2023 THROUGH AND INCLUDING JULY 31, 2024**

<sup>1</sup> On August 21, 2024, the Court entered the *Order Containing a Post-Confirmation Timetable as Required by Local Rule 3021-1*, closing the chapter 11 cases of Mercon Coffee Corporation and certain of its debtor affiliates and thereby directing that all motions, notices, and other pleadings related to any of the affiliated debtors be filed in this case. Prior to the Effective Date, the Debtors in these cases, along with the last four (4) digits of each Debtor's federal tax identification number, if applicable, were: Mercon Coffee Corporation (1844); Mercon B.V. (N/A); Mercon Brasil Comércio de Café Ltda. (N/A); Agro International Holding B.V. (N/A); Mercapital de Nicaragua, S.A. (N/A); Distribuidora de Granos de Nicaragua S.A. (N/A); Cisa Export S.A. (N/A); Comercial Internacional de Granos de Honduras, S.A. de C.V. (N/A); Mercon Guatemala, S.A. (N/A); Comercial Internacional Exportadora, S.A. (N/A). All docket numbers referenced herein refer to pleadings filed in Mercon Coffee Corporation, Case No. 23-11945 (MEW).

**SUMMARY COVER SHEET**

Commencement Date	December 6, 2023
Retention date	December 6, 2023
Date of order approving employment	January 30, 2024
<b>Summary for Second Interim Period</b>	
Time Period Covered by this Application for Second Interim Period:	April 1, 2024 through July 31, 2024
Total compensation sought for Second Interim Period	\$2,406,932.59
Total expenses sought for Second Interim Period	\$28,654.67
Compensation sought and already paid for Second Interim Period pursuant to an interim compensation order but not yet Allowed	\$1,296,931.07
Expenses sought and already paid for Second Interim Period pursuant to an interim compensation order but not yet allowed	\$13,236.43
Blended rate for Second Interim Period for all attorneys	\$1,146.92
Blended rate for Second Interim Period for all timekeepers	\$1,042.41
Number of professionals (and paraprofessionals) included in this application	Professionals: 49
	Paraprofessionals: 7
	Total: 56
Number of professionals (and paraprofessionals) billing fewer than 15 hours to the case during this period	Professionals: 34
	Paraprofessionals: 5
	Total: 39
Are any rates higher than those approved or disclosed at retention?	No
<b>Summary for Final Period</b>	
Time Period Covered by this Application for Final Period:	December 6, 2023 through July 31, 2024
Total Compensation Requested for Final Period <sup>1</sup>	\$7,390,359.47
Total Expenses Requested for Final Period	\$91,340.47

<sup>1</sup> Excludes agreed-upon reduction for first interim period in the amount of \$100,000.00.

**SUMMARY COVER SHEET**

Total compensation approved by interim orders to date	\$4,883,426.88
Total expenses approved by interim orders to date	\$62,685.80
Total compensation allowed to be paid pursuant to the First Interim Order <sup>2</sup>	\$4,133,426.88
Total expenses allowed to be paid pursuant to the First Interim Order	\$62,685.80
Blended rate for Final Period for all attorneys	\$1,157.16
Blended rate for Final Period for all timekeepers	\$1,062.31
Number of professionals (and paraprofessionals) included in this application	Professionals: 84
	Paraprofessionals: 16
	Total: 100
Number of professionals (and paraprofessionals) billing fewer than 15 hours to the case during this period	Professionals: 55
	Paraprofessionals: 14
	Total: 69
Are any rates higher than those approved or disclosed at retention?	No

This is a(n): \_\_\_ interim X interim and final application.

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<sup>2</sup> Baker McKenzie agreed to a holdback of \$750,000.00 solely for distribution purposes.

**SUMMARY OF PRIOR MONTHLY FEE STATEMENTS**  
**FIRST INTERIM PERIOD/ FIRST INTERIM FEE APPLICATION**

[illegible]



**SUMMARY OF PRIOR MONTHLY FEE STATEMENTS**  
**SECOND INTERIM PERIOD / SECOND INTERIM FEE APPLICATION**

Date Filed and Doc. No.	Period Covered	Total Compensation and Expenses Incurred for Period Covered		Total Amount Previously Requested with Prior Monthly Fee Statement		Total Amount Paid to Date		Holdback Fees Requested
		Fees	Expenses	Fees (@ 80%)	Expenses (@ 100%)	Fees (@ 80%)	Expenses (@ 100%)	Fees (@ 20%)
June 7, 2024 Doc. No. 576	April 1, 2024 through April 30, 2024	\$927,974.32	\$8,061.59	\$742,379.46	\$8,061.59	\$742,379.46	\$8,061.59	\$185,594.86
June 7, 2024 Doc. No. 578	May 1, 2024 through May 31, 2024	\$693,189.52	\$5,174.84	\$554,551.62	\$5,174.84	\$554,551.62	\$5,174.84	\$138,637.90
Not filed with Court – Included in this Fee Application Doc. No. n/a	June 1, 2024 through June 30, 2024	\$587,802.38	\$9,786.19	n/a	n/a	\$0.00	\$0.00	n/a
Not filed with Court – Included in this Fee Application Doc. No. n/a	July 1, 2024 through July 31, 2024	\$197,966.37	\$5,632.05	n/a	n/a	\$0.00	\$0.00	n/a
<b>Total for Second Interim Period</b>		<b>\$2,406,932.59</b>	<b>\$28,654.67</b>	<b>\$1,296,931.08</b>	<b>\$13,236.43</b>	<b>\$1,296,931.08</b>	<b>\$13,236.43</b>	<b>\$324,232.76</b>

Summary of Any Objections to Monthly Fee Statements: None.

Compensation Sought for Second Interim Period Not Yet Paid: \$1,125,419.75

**SUMMARY OF FIRST AND SECOND INTERIM PERIODS**

<b>Period</b>	<b>Fees Requested</b>	<b>Expenses Requested</b>	<b>Total</b>
First Interim Period	\$4,983,426.88	\$62,685.80	\$5,046,112.68
Second Interim Period	\$2,406,932.59	\$28,654.67	\$2,435,587.26
Total	\$7,390,359.47	\$91,340.47	\$7,481,699.94
<b>Voluntary Reduction</b>			-\$100,000.00
<b>Net Final Amount Requested</b>			\$7,381,699.94
<b>Minus Payments Received</b>			\$5,506,280.19
<b>Balance Due</b>			\$1,875,419.75

**COMPENSATION BY PROFESSIONAL FOR  
SECOND INTERIM PERIOD APRIL 1, 2024 THROUGH JULY 31, 2024**

The attorneys who rendered professional services in these chapter 11 cases during the Compensation Period are:

NAME OF PROFESSIONAL	POSITION	DEPARTMENT	YEAR ADMITTED	HOURLY BILLING RATE	TOTAL HOURS BILLED	TOTAL COMPENSATION
Adam Aft (IL)	Partner	Intellectual Property & Technology Law	2015	\$1,225.00	1.10	\$1,347.50
Adriana Stamato (São Paulo)	Partner	Tax	2000	\$750.00	1.00	\$750.00
Blaire Cahn (NY)	Partner	Restructuring & Insolvency	2009	\$1,345.00	4.10	\$5,514.50
Cecilia Pastor (Madrid)	Partner	Trade & Commerce	1989	\$670.14 <sup>1</sup>	.50	\$335.07
Clare Montgomery (Bogota)	Partner	Commercial Contracts, Real Estate	1994	\$740.00	.60	\$444.00
Federico Cuadra Del Carmen (FL)	Partner	Corporate & Securities	2014	\$1,345.00	201.30	\$270,748.50
Gledson Marques de Campos (Sao Paulo)	Partner	Litigation/Arbitration & Dispute Resolution	2000	\$850.00	46.70	\$39,695.00
Hoang Anh Nguyen (Ho Chi Minh City)	Of Counsel	Employment & Compensation	2023	\$480.00	31.20	\$14,976.00
Jacob Kaplan (NY)	Partner	Litigation/Arbitration & Dispute Resolution	2003	\$1,295.00	16.40	\$21,238.00
John R. Dodd (FL)	Partner	Restructuring & Insolvency	2007	\$1,345.00	86.20	\$115,939.00

<sup>1</sup> Average Estimated Rate in USD

**COMPENSATION BY PROFESSIONAL FOR  
SECOND INTERIM PERIOD APRIL 1, 2024 THROUGH JULY 31, 2024**

NAME OF PROFESSIONAL	POSITION	DEPARTMENT	YEAR ADMITTED	HOURLY BILLING RATE	TOTAL HOURS BILLED	TOTAL COMPENSATION
John R. Dodd (FL)	Partner	Restructuring & Insolvency	2007	\$672.50 <sup>2</sup>	6.90	\$4,640.25
Kai Kramer (TX)	Partner	Tax	2005	\$1,545.00	.70	\$1,081.50
Kevin Whittam (NY)	Partner	Banking & Finance	2015	\$1,345.00	3.90	\$5,245.50
Kim Tan (Amsterdam)	Partner	Corporate Reorganizations	1999 <sup>3</sup>	\$827.16 <sup>1</sup>	1.80	\$1,488.89
Mark Bloom (FL)	Partner	Restructuring & Insolvency	1980	\$1,645.00	123.00	\$202,335.00
Matthew Smith (NY)	Of Counsel	Banking & Finance	2012	\$1,295.00	7.80	\$10,101.00
Oanh Nguyen (Ho Chi Minh City)	Partner	Banking & Finance	1999	\$950.00	12.60	\$11,970.00
Paul J. Keenan Jr. (FL)	Partner	Restructuring & Insolvency	2002	\$1,645.00	327.40	\$538,573.00
Paul J. Keenan Jr. (FL)	Partner	Restructuring & Insolvency	2002	\$822.50 <sup>2</sup>	16.60	\$13,653.50
Ronald Ohren (IL)	Of Counsel	Litigation/Arbitration & Dispute Resolution	1986	\$1,270.00	1.00	\$1,270.00
Ross Staine (TX)	Partner	Tax	2014	\$1,295.00	.70	\$906.50

<sup>2</sup> Rate reduced by 50% for non-working travel time.

<sup>3</sup> Civil Law Notary

**COMPENSATION BY PROFESSIONAL FOR  
SECOND INTERIM PERIOD APRIL 1, 2024 THROUGH JULY 31, 2024**

<b>NAME OF PROFESSIONAL</b>	<b>POSITION</b>	<b>DEPARTMENT</b>	<b>YEAR ADMITTED</b>	<b>HOURLY BILLING RATE</b>	<b>TOTAL HOURS BILLED</b>	<b>TOTAL COMPENSATION</b>
Silvia Bernardino (Sao Paulo)	Partner	Mergers, Acquisitions, Corporate Finance	2008	\$685.00	10.00	\$6,850.00
Steven Canner (NY)	Partner	Corporate & Securities	1991	\$1,645.00	2.30	\$3,783.50
Telirio Saraiva (Sao Paulo)	Partner	Tax	2018	\$750.00	4.50	\$3,375.00
Thi Thanh Hoa Dao (Ho Chi Min)	Of Counsel	Tax	2010	\$520.00	2.00	\$1,040.00
<b>Partners and Counsel Totals</b>					<b>910.30</b>	<b>\$1,277,301.21</b>

**COMPENSATION BY PROFESSIONAL FOR  
SECOND INTERIM PERIOD APRIL 1, 2024 THROUGH JULY 31, 2024**

NAME OF PROFESSIONAL	POSITION	DEPARTMENT	YEAR ADMITTED	HOURLY BILLING RATE	TOTAL HOURS BILLED	TOTAL COMPENSATION
Ana Marcos (FL)	Associate	Corporate & Securities	2021	\$795.00	11.10	\$8,824.50
Annasofia Roig (FL)	Associate	Litigation/Arbitration & Dispute Resolution	2019	\$895.00	13.40	\$11,993.00
Camila Siqueira (São Paulo)	Associate	Tax	2022	\$370.00	9.50	\$3,515.00
Dionna Shear (NY)	Associate	Employment & Compensation	2015	\$1,060.00	20.30	\$21,518.00
Estefania Lalinde (FL)	Associate	Corporate & Securities	2022	\$750.00	.80	\$600.00
Eugenia Vazquez (Madrid)	Associate	Corporate	2013	\$504.84 <sup>1</sup>	9.50	\$4,796.01
Grace Blackburn (NY)	Associate	Private Equity	2019	\$850.00	72.50	\$61,625.00
Gustavo Freitas (São Paulo)	Associate	Mergers, Acquisitions, Corporate Finance	2022	\$335.00	8.20	\$2,747.00
Hein Blaauwendraad (Amsterdam)	Associate	Corporate Reorganizations	2022	\$338.96 <sup>1</sup>	1.20	\$406.75
James Gilmore (DC)	Associate	Litigation/Arbitration & Dispute Resolution	2021	\$825.00	10.10	\$8,332.50
Jeroen Posthumus (Amsterdam)	Associate	Corporate Reorganizations	2022	\$337.75 <sup>1</sup>	1.30	\$439.08

**COMPENSATION BY PROFESSIONAL FOR  
SECOND INTERIM PERIOD APRIL 1, 2024 THROUGH JULY 31, 2024**

NAME OF PROFESSIONAL	POSITION	DEPARTMENT	YEAR ADMITTED	HOURLY BILLING RATE	TOTAL HOURS BILLED	TOTAL COMPENSATION
Jonathan Susko (NY)	Associate	Corporate & Securities	2016	\$1,125.00	36.30	\$40,837.50
Joseph Chung (TX)	Associate	Tax	2023	\$750.00	.50	\$375.00
Karen Santamaria (Bogota)	Associate	Commercial Contracts, Real Estate	2011	\$620.00	3.70	\$2,294.00
Mariana Conrado (São Paulo)	Associate	Litigation/Arbitration & Dispute Resolution	2013	\$545.00	11.80	\$6,431.00
Michael Matthiesen (FL)	Associate	Litigation/Arbitration & Dispute Resoltn	2023	\$670.00	20.60	\$13,802.00
Phuoc Anh Tram Nguyen (Ho Chi Minh City)	Associate	Banking & Finance	2023	\$280.00	109.80	\$30,744.00
Reginald Sainvil (FL)	Associate	Restructuring & Insolvency	2015	\$1,195.00	534.40	\$638,608.00
Rocio Gonzalez (Madrid)	Associate	Litigation/Arbitration & Dispute Resolution	2005	\$552.20 <sup>1</sup>	.50	\$276.10
Tuan Minh Le (Ho Chi Minh City)	Associate	Litigation/Arbitration & Dispute Resolution	2016	\$350.00	1.00	\$350.00
Thijs Bogaers (Amsterdam)	Associate	Corporate Reorganizations	2016	\$613.69 <sup>1</sup>	38.40	\$23,565.85
Sanny Doan (Ho Chi Minh City)	Associate	Employment & Compensation	2023	\$300.00	.70	\$210.00

**COMPENSATION BY PROFESSIONAL FOR  
SECOND INTERIM PERIOD APRIL 1, 2024 THROUGH JULY 31, 2024**

NAME OF PROFESSIONAL	POSITION	DEPARTMENT	YEAR ADMITTED	HOURLY BILLING RATE	TOTAL HOURS BILLED	TOTAL COMPENSATION
Thais Barboza (São Paulo)	Associate	Labor, Employment, & Employee Benefits	n/a	\$335.00	18.90	\$6,331.50
Thi Phuong Thao Nguyen (Hanoi)	Associate	Employment & Compensation	n/a	\$230.00	3.60	\$828.00
Trung Nguyen Nguyen (Ho Chi Minh City)	Associate	Transactional	2023	\$200.00	5.30	\$1,060.00
Zachary Bassen (NY)	Associate	Corporate & Securities	2023	\$750.00	105.20	\$78,900.00
<b>Associate Total</b>					<b>1,048.60</b>	<b>\$969,409.79</b>



**COMPENSATION BY PROFESSIONAL FOR  
SECOND INTERIM PERIOD APRIL 1, 2024 THROUGH JULY 31, 2024**

The paraprofessionals who rendered professional services in these chapter 11 cases during the Second Interim Period are:

NAME OF PROFESSIONAL	DEPARTMENT	HOURLY BILLING RATE	TOTAL HOURS BILLED	TOTAL COMPENSATION
Zachary Bethel (NY) [Summer Associate]	General	\$485.00	3.00	\$1,455.00
Thi Bich Hanh Phan (Hanoi) [Law Clerk]	Mergers, Acquisitions, Corporate Finance	\$140.00	.50	\$70.00
Annika Thorelli (NY) [Paralegal]	Corporate & Securities	\$470.00	6.10	\$2,867.00
Cecilia Reategui (FL) [Paralegal]	Tax	\$455.00	11.50	\$5,232.50
Lori Seavey (FL) [Paralegal]	Restructuring & Insolvency	\$465.00	102.20	\$47,523.00
Maribel R. Fontanez (FL) [Paralegal]	Restructuring & Insolvency	\$465.00	212.70	\$98,905.50
Merredith Fong-Akan [Paralegal] [Amsterdam]	Corporate Reorganizations	\$295.65 <sup>1</sup>	14.10	\$4,168.59
<b>Paraprofessional Total</b>			350.10	\$160,221.59

The total fees for the Second Interim Period are: \$2,406,932.59

**COMPENSATION BY PROFESSIONAL FOR  
SECOND INTERIM PERIOD APRIL 1, 2024 THROUGH JULY 31, 2024**

<b>PROFESSIONALS</b>	<b>BLENDED RATE</b>	<b>TOTAL HOURS BILLED</b>	<b>TOTAL COMPENSATION</b>
Partners and Counsel (23)	\$1,403.17	910.30	\$1,277,301.21
Associates (26)	\$924.48	1,048.60	\$969,409.79
Paraprofessionals (7)	\$457.65	350.10	\$160,221.59
Blended Attorney Rate	\$1,146.92	1,958.90	\$2,246,711.00
Blended Rate for All Timekeepers	\$1,042.41	2,309.00	\$2,406,932.59

**COMPENSATION BY CATEGORIES FOR  
SECOND INTERIM PERIOD APRIL 1, 2024 THROUGH JULY 31, 2024**

<b>TASK CODE</b>	<b>PROJECT CATEGORY</b>	<b>TOTAL HOURS BILLED</b>	<b>AMOUNT</b>
<b>B100</b>	Administration / General Corporate Administration	153.00	\$204,201.00
<b>B110</b>	Case Administration	175.10	\$166,824.00
<b>B120</b>	Asset Analysis Recovery	17.20	\$19,349.50
<b>B130</b>	Asset Disposition	547.50	\$432,512.76
<b>B140</b>	Relief From Stay /Adequate Protection	13.40	\$15,340.00
<b>B150</b>	Meetings and Communications w/Creditors	3.20	\$4,910.00
<b>B160</b>	Fee/Employment Applications	104.50	\$54,542.50
<b>B170</b>	Fee/Employment Objections	1.50	\$697.50
<b>B185</b>	Assumption/Rejection of Leases and Contracts	6.60	\$5,624.85
<b>B190</b>	Other Contested Matters	116.00	\$107,489.87
<b>B195</b>	Non-Working Travel (Billed at 50% Rate)	23.50	\$18,293.75
<b>B210</b>	Business Operations	11.10	\$12,361.50
<b>B220</b>	Employee Benefits / Pensions	4.40	\$1,200.00
<b>B230</b>	Financing / Cash Collections	31.40	\$42,669.00

**COMPENSATION BY CATEGORIES FOR  
SECOND INTERIM PERIOD APRIL 1, 2024 THROUGH JULY 31, 2024**

<b>B240</b>	Tax Issues	16.80	\$9,233.50
<b>B260</b>	Board of Directors Matters	8.10	\$4,037.12
<b>B310</b>	Claims Administration and Objections	11.00	\$13,208.00
<b>B320</b>	Plan & Disclosure Statement	995.40	\$1,245,740.50
<b>B400</b>	Bankruptcy Related Advise	5.30	\$2,681.65
<b>B410</b>	General Bankruptcy Advice/Opinions	64.00	\$46,015.59
<b>Total:</b>		<b>2,309.00</b>	<b>\$2,406,932.59</b>

**EXPENSES BY CATEGORIES FOR  
SECOND INTERIM PERIOD APRIL 1, 2024 THROUGH JULY 31, 2024**

<b>EXPENSE CATEGORY</b>	<b>TOTAL</b>
Airfare	\$1,840.65
Apostille Fees	\$2,131.35
Certified Copies	\$0.00
Computer Research	\$2,311.23
Copies	\$50.65
Courier/Messenger	\$814.74
CourtSolutions	\$1,260.00
Documents – Brazil	\$0.00
E-Discovery	\$200.00
Filing Fees	\$2,386.90
In-Flight Wi-Fi	\$0.00
Lien Search / Searches	\$0.00
Lodging	\$7,620.13
Meals	\$269.45
Outside Document Production	\$1,556.55
Parking	\$50.00
Transcripts	\$246.20
Translation	\$716.52
Transportation	\$2,334.14
VAT Charges for Vietnam	\$4,866.16
<b>Total:</b>	<b>\$28,654.67</b>

**COMPENSATION BY PROFESSIONAL FOR  
FINAL PERIOD DECEMBER 6, 2023 THROUGH JULY 31, 2024**

The attorneys who rendered professional services in these chapter 11 cases during the Compensation Period are:

NAME OF PROFESSIONAL	POSITION	DEPARTMENT	YEAR ADMITTED	HOURLY BILLING RATE	TOTAL HOURS BILLED	TOTAL COMPENSATION
Adam Aft (IL)	Partner	Intellectual Property & Technology Law	2015	\$1,225.00	1.10	\$1,347.50
Adriana Stamato (São Paulo)	Partner	Tax	2000	\$750.00	1.00	\$750.00
Alexandre Lamy (DC)	Partner	International Commercial	2009	\$1,260.00	2.00	\$2,520.00
Benjamin Davis (FL)	Partner	Litigation/Arbitration & Dispute Resolution	2014	\$1,195.00	36.00	\$43,020.00
Blaire Cahn (NY)	Partner	Restructuring & Insolvency	2009	\$1,345.00	243.30	\$327,238.50
Brian Burke (DC)	Partner	Litigation/Arbitration & Dispute Resolution	1998	\$1,395.00	5.60	\$7,812.00
Cecilia Pastor (Madrid)	Partner	Trade & Commerce	1989	\$678.35 <sup>1</sup>	1.50	\$1,017.52
Christopher Guldberg (IL)	Partner	Employment & Compensation	1992	\$1,235.00	1.30	\$1,605.50
Clare Montgomery (Bogota)	Partner	Commercial Contracts, Real Estate	1994	\$740.00	.60	\$444.00
Cyrus Vance (NY)	Partner	Litigation/Arbitration & Dispute Resolution	1983	\$1,735.00	2.50	\$4,337.50

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<sup>1</sup> Average Estimated Rate in USD

**COMPENSATION BY PROFESSIONAL FOR  
FINAL PERIOD DECEMBER 6, 2023 THROUGH JULY 31, 2024**

NAME OF PROFESSIONAL	POSITION	DEPARTMENT	YEAR ADMITTED	HOURLY BILLING RATE	TOTAL HOURS BILLED	TOTAL COMPENSATION
Federico Cuadra Del Carmen (FL)	Partner	Corporate & Securities	2014	\$1,345.00	697.40	\$938,003.00
Fedor Tanke (Amsterdam)	Of Counsel	Banking & Finance	1996	\$731.24 <sup>1</sup>	9.70	\$7,093.00
Gledson Marques de Campos (Sao Paulo)	Partner	Litigation/Arbitration & Dispute Resolution	2000	\$850.00	194.10	\$164,985.00
Henrik Stipdonk (Amsterdam)	Of Counsel	Tax	2009	\$874.24 <sup>1</sup>	1.90	\$1,661.06
Hoang Anh Nguyen (Ho Chi Minh City)	Of Counsel	Employment & Compensation	2023	\$480.00	54.00	\$25,920.00
Jacob Kaplan (NY)	Partner	Litigation/Arbitration & Dispute Resolution	2003	\$1,295.00	16.40	\$21,238.00
John R. Dodd (FL)	Partner	Restructuring & Insolvency	2007	\$1,345.00	504.20	\$678,149.00
John R. Dodd (FL)	Partner	Restructuring & Insolvency	2007	\$672.50 <sup>2</sup>	65.30	\$43,914.25
Kai Kramer (TX)	Partner	Tax	2005	\$1,545.00	9.50	\$14,677.50
Kerry Contini (DC)	Partner	International Commercial	2006	\$1,350.00	.90	\$1,215.00

<sup>2</sup> Rate reduced by 50% for non-working travel time.

**COMPENSATION BY PROFESSIONAL FOR  
FINAL PERIOD DECEMBER 6, 2023 THROUGH JULY 31, 2024**

NAME OF PROFESSIONAL	POSITION	DEPARTMENT	YEAR ADMITTED	HOURLY BILLING RATE	TOTAL HOURS BILLED	TOTAL COMPENSATION
Kevin Whittam (NY)	Partner	Banking & Finance	2015	\$1,345.00	178.70	\$240,351.50
Kim Tan (Amsterdam)	Partner	Corporate Reorganizations	1999 <sup>3</sup>	\$827.55 <sup>1</sup>	2.00	\$1,655.10
Marc Florent (London)	Partner	Litigation/Arbitration & Dispute Resolution	1992	\$1,252.80 <sup>1</sup>	3.30	\$4,134.24
Mark Bloom (FL)	Partner	Restructuring & Insolvency	1980	\$1,645.00	277.00	\$455,665.00
Matthew Dening (London)	Partner	Banking & Finance – Structured Capital Market	1995	\$1,391.61	4.10	\$5,705.61
Matthew Smith (NY)	Of Counsel	Banking & Finance	2012	\$1,295.00	195.40	\$253,043.00
Oanh Nguyen (Ho Chi Minh City)	Partner	Banking & Finance	1999	\$950.00	53.80	\$51,110.00
Paul J. Keenan Jr. (FL)	Partner	Restructuring & Insolvency	2002	\$1,645.00	759.10	\$1,248,719.50
Paul J. Keenan Jr. (FL)	Partner	Restructuring & Insolvency	2002	\$822.50 <sup>2</sup>	70.50	\$57,986.25
Ronald Ohren (IL)	Of Counsel	Litigation/Arbitration & Dispute Resolution	1986	\$1,270.00	1.60	\$2,032.00
Ross Staine (TX)	Partner	Tax	2014	\$1,295.00	12.30	\$15,928.50

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<sup>3</sup> Civil Law Notary



**COMPENSATION BY PROFESSIONAL FOR  
FINAL PERIOD DECEMBER 6, 2023 THROUGH JULY 31, 2024**

<b>NAME OF PROFESSIONAL</b>	<b>POSITION</b>	<b>DEPARTMENT</b>	<b>YEAR ADMITTED</b>	<b>HOURLY BILLING RATE</b>	<b>TOTAL HOURS BILLED</b>	<b>TOTAL COMPENSATION</b>
Silvia Bernardino (Sao Paulo)	Partner	Mergers, Acquisitions, Corporate Finance	2008	\$685.00	22.30	\$15,275.50
Steven Canner (NY)	Partner	Corporate & Securities	1991	\$1,645.00	31.00	\$50,995.00
Telirio Saraiva (Sao Paulo)	Partner	Tax	2018	\$750.00	4.50	\$3,375.00
Thanh Vinh Nguyen (Ho Chi Min)	Partner	Tax	2007	\$800.00	3.80	\$3,040.00
Thi Thanh Hoa Dao (Ho Chi Min)	Of Counsel	Tax	2010	\$520.00	7.50	\$3,900.00
Wibren Veldhuizen (Amsterdam)	Partner	Tax	2003	\$1,032.91 <sup>1</sup>	1.60	\$1,652.65
William Devaney (NY)	Partner	Litigation/Arbitration & Dispute Resolution	1992	\$1,505.00	2.60	\$3,913.00
William Roppolo (FL)	Partner	Litigation/Arbitration & Dispute Resolution	1999	\$1,430.00	11.80	\$16,874.00
<b>Partners and Counsel Totals</b>					<b>3,491.20</b>	<b>\$4,722,304.18</b>

**COMPENSATION BY PROFESSIONAL FOR  
FINAL PERIOD DECEMBER 6, 2023 THROUGH JULY 31, 2024**

<b>NAME OF PROFESSIONAL</b>	<b>POSITION</b>	<b>DEPARTMENT</b>	<b>YEAR ADMITTED</b>	<b>HOURLY BILLING RATE</b>	<b>TOTAL HOURS BILLED</b>	<b>TOTAL COMPENSATION</b>
Alysha Preston (NY)	Associate	Intellectual Property & Technology Law	2017	\$1,095.00	2.00	\$2,190.00
Ana Marcos (FL)	Associate	Corporate & Securities	2021	\$795.00	62.30	\$49,528.50
Annasofia Roig (FL)	Associate	Litigation/Arbitration & Dispute Resolution	2019	\$895.00	13.40	\$11,993.00
Bruno Cesar Tavares da Silva (São Paulo)	Associate	Mergers, Acquisitions, Corporate Finance	2020	\$375.00	4.10	\$1,537.50
Camila Siqueira (São Paulo)	Associate	Tax	2022	\$370.00	9.50	\$3,515.00
Chehak Gogia (NY)	Associate	Litigation/Arbitration & Dispute Resolution	2023	\$670.00	14.40	\$9,648.00
Courtney Giles (TX)	Associate	Litigation/Arbitration & Dispute Resolution	2015	\$1,115.00	118.40	\$132,016.00
Daniel Kelderhuis (Amsterdam)	Associate	Banking & Finance	2021	\$469.74 <sup>1</sup>	2.80	\$1,315.26
Darley Maw (NY)	Associate	Litigation/Arbitration & Dispute Resolution	2017	\$1,130.00	5.30	\$5,989.00
Dionna Shear (NY)	Associate	Employment & Compensation	2015	\$1,060.00	20.30	\$21,518.00
Eleanor Dive (London)	Associate	Litigation/Arbitration & Dispute Resolution	n/a	\$378.66 <sup>1</sup>	5.80	\$2,196.20

**COMPENSATION BY PROFESSIONAL FOR  
FINAL PERIOD DECEMBER 6, 2023 THROUGH JULY 31, 2024**

<b>NAME OF PROFESSIONAL</b>	<b>POSITION</b>	<b>DEPARTMENT</b>	<b>YEAR ADMITTED</b>	<b>HOURLY BILLING RATE</b>	<b>TOTAL HOURS BILLED</b>	<b>TOTAL COMPENSATION</b>
Estefania Lalinde (FL)	Associate	Corporate & Securities	2022	\$750.00	1.30	\$975.00
Eugenia Vazquez (Madrid)	Associate	Corporate	2013	\$508.79 <sup>1</sup>	22.00	\$11,193.47
Grace Blackburn (NY)	Associate	Private Equity	2019	\$850.00	311.90	\$265,115.00
Gregorio Ruggeri-Laderchi (Amsterdam)	Associate	Litigation/Arbitration & Dispute Resolution	2020	\$474.98 <sup>1</sup>	1.60	\$759.97
Gustavo Freitas (São Paulo)	Associate	Mergers, Acquisitions, Corporate Finance	2022	\$335.00	21.80	\$7,303.00
Heidi Smucker (DC)	Associate	Litigation/Arbitration & Dispute Resoltn	2020	\$825.00	14.70	\$12,127.50
Hein Blaauwendraad (Amsterdam)	Associate	Corporate Reorganizations	2022	\$338.96 <sup>1</sup>	1.20	\$406.75
Isabelle Bronzwaer (Amsterdam)	Associate	Tax	2015	\$652.98 <sup>1</sup>	1.10	\$718.28
Ilse Bosman (Amsterdam)	Associate	Tax	2017	\$617.70 <sup>1</sup>	10.60	\$6,547.58
James Gilmore (DC)	Associate	Litigation/Arbitration & Dispute Resolution	2021	\$825.00	10.10	\$8,332.50
Javier Pera (Madrid)	Associate	Labor, Employment & Employee Benefits	2008	\$556.97 <sup>1</sup>	9.10	\$5,068.38

**COMPENSATION BY PROFESSIONAL FOR  
FINAL PERIOD DECEMBER 6, 2023 THROUGH JULY 31, 2024**

<b>NAME OF PROFESSIONAL</b>	<b>POSITION</b>	<b>DEPARTMENT</b>	<b>YEAR ADMITTED</b>	<b>HOURLY BILLING RATE</b>	<b>TOTAL HOURS BILLED</b>	<b>TOTAL COMPENSATION</b>
Jeffrey Butler (IL)	Associate	Litigation/Arbitration & Dispute Resolution	2022	\$670.00	10.50	\$7,035.00
Jeroen Posthumus (Amsterdam)	Associate	Corporate Reorganizations	2022	\$341.38 <sup>1</sup>	3.40	\$1,160.70
Jonathan Susko (NY)	Associate	Corporate & Securities	2016	\$1,125.00	65.40	\$73,575.00
Joseph Chung (TX)	Associate	Tax	2023	\$750.00	14.20	\$10,650.00
Kalli McCoy (TX)	Associate	Litigation/Arbitration & Dispute Resolution	2021	\$760.00	80.50	\$61,180.00
Karen Santamaria (Bogota)	Associate	Commercial Contracts, Real Estate	2011	\$620.00	3.70	\$2,294.00
Laura van Kleef (Amsterdam)	Associate	Tax	2023	\$388.55 <sup>1</sup>	3.20	\$1,243.36
Maria Delso (Madrid)	Associate	Tax	2017	\$478.26 <sup>1</sup>	.70	\$334.78
Mariana Conrado (São Paulo)	Associate	Litigation/Arbitration & Dispute Resolution	2013	\$545.00	69.00	\$37,605.00
Megan Ruigrok (Amsterdam)	Associate	Tax	2014	\$774.53 <sup>1</sup>	1.80	\$1,394.16
Michael Matthiesen (FL)	Associate	Litigation/Arbitration & Dispute Resoltn	2023	\$670.00	38.60	\$25,862.00

**COMPENSATION BY PROFESSIONAL FOR  
FINAL PERIOD DECEMBER 6, 2023 THROUGH JULY 31, 2024**

<b>NAME OF PROFESSIONAL</b>	<b>POSITION</b>	<b>DEPARTMENT</b>	<b>YEAR ADMITTED</b>	<b>HOURLY BILLING RATE</b>	<b>TOTAL HOURS BILLED</b>	<b>TOTAL COMPENSATION</b>
Phuoc Anh Tram Nguyen (Ho Chi Minh City)	Associate	Banking & Finance	2023	\$280.00	235.40	\$65,912.00
Ralph Potgieter (Amsterdam)	Associate	Tax	2019	\$550.90 <sup>1</sup>	3.70	\$2,038.33
Reginald Sainvil (FL)	Associate	Restructuring & Insolvency	2015	\$1,195.00	972.50	\$1,162,137.50
Reginald Sainvil (FL)	Associate	Restructuring & Insolvency	2015	\$597.50	5.00	\$2,987.50
Rocio Gonzalez (Madrid)	Associate	Litigation/Arbitration & Dispute Resolution	2005	\$555.57 <sup>1</sup>	.90	\$500.01
Rylie Hayes (TX)	Associate	Litigation/Arbitration & Dispute Resoltn	2023	\$670.00	5.10	\$3,417.00
Sanny Doan (Ho Chi Minh City)	Associate	Employment & Compensation	2023	\$300.00	.70	\$210.00
Santiago Teran (Madrid)	Associate	Commercial	2008	\$562.34 <sup>1</sup>	8.90	\$5,003.94
Thais Barboza (São Paulo)	Associate	Labor, Employment, & Employee Benefits	n/a	\$335.00	33.60	\$11,256.00
Thijs Bogaers (Amsterdam)	Associate	Corporate Reorganizations	2016	\$615.75 <sup>1</sup>	78.10	\$48,090.03
Thi Phuong Thao Nguyen (Hanoi)	Associate	Employment & Compensation	n/a	\$230.00	12.20	\$2,806.00

**COMPENSATION BY PROFESSIONAL FOR  
FINAL PERIOD DECEMBER 6, 2023 THROUGH JULY 31, 2024**

<b>NAME OF PROFESSIONAL</b>	<b>POSITION</b>	<b>DEPARTMENT</b>	<b>YEAR ADMITTED</b>	<b>HOURLY BILLING RATE</b>	<b>TOTAL HOURS BILLED</b>	<b>TOTAL COMPENSATION</b>
Thi Thu Van Tran (Vietnam)	Associate	Tax	2019	\$310.00	1.80	\$558.00
Trung Nguyen Nguyen (Ho Chi Minh City)	Associate	Transactional	2023	\$200.00	12.60	\$2,520.00
Tuan Minh Le (Ho Chi Minh City)	Associate	Litigation/Arbitration & Dispute Resolution	2016	\$350.00	6.40	\$2,240.00
Zachary Bassen (NY)	Associate	Corporate & Securities	2023	\$750.00	187.70	\$140,775.00
<b>Associate Total</b>					<b>2,519.30</b>	<b>\$2,232,779.20</b>

**COMPENSATION BY PROFESSIONAL FOR  
FINAL PERIOD DECEMBER 6, 2023 THROUGH JULY 31, 2024**

The paraprofessionals who rendered professional services in these chapter 11 cases during the Second Interim Period are:

NAME OF PROFESSIONAL	DEPARTMENT	HOURLY BILLING RATE	TOTAL HOURS BILLED	TOTAL COMPENSATION
Zachary Bethel (NY) [Summer Associate]	General	\$485.00	3.00	\$1,455.00
Ha An Ngoc Le (Hanoi) [Law Clerk]	Employment & Compensation	\$170.00	1.10	\$187.00
Samantha Osaki (Sao Paulo) [Law Clerk]	Litigation/Arbitration & Dispute Resolution	\$130.00	3.00	\$390.00
Thi Bich Hanh Phan (Hanoi) [Law Clerk]	Mergers, Acquisitions, Corporate Finance	\$140.00	.90	\$126.00
Terry Allen (NY) [Law Clerk]	Corporate & Securities	\$750.00	4.30	\$3,225.00
Thuy Duong Vu (Vietnam) [Trainee]	Litigation/Arbitration & Dispute Resolution	\$140.00	.50	\$70.00
David Cederquist (CA) [Manager, Global eDiscovery & Data Advisory, Americas]	General	\$475.00	.70	\$332.50
Ben Flint (DC) [Senior Support Analyst]	Litigation/Arbitration & Dispute Resolution	\$400.00	5.90	\$2,360.00
Valerie Spears (DC) [Analyst]	General	\$400.00	2.60	\$1,040.00
Annika Thorelli (NY) [Paralegal]	Corporate & Securities	\$470.00	6.10	\$2,867.00

**COMPENSATION BY PROFESSIONAL FOR  
FINAL PERIOD DECEMBER 6, 2023 THROUGH JULY 31, 2024**

NAME OF PROFESSIONAL	DEPARTMENT	HOURLY BILLING RATE	TOTAL HOURS BILLED	TOTAL COMPENSATION
Cecilia Reategui (FL) [Paralegal]	Tax	\$455.00	12.90	\$5,869.50
Lori Seavey (FL) [Paralegal]	Restructuring & Insolvency	\$465.00	450.50	\$209,482.50
Maria Machado (São Paulo) [Paralegal]	Mergers, Acquisitions, Corporate Finance	\$195.00	4.70	\$916.50
Maribel R. Fontanez (FL) [Paralegal]	Restructuring & Insolvency	\$465.00	435.90	\$202,693.50
Merredith Fong-Akan [Paralegal] [Amsterdam]	Corporate Reorganizations	\$295.65 <sup>1</sup>	14.10	\$4,168.59
Ryan Orange (DC) [Paralegal]	International Commercial	\$465.00	.20	\$93.00
<b>Paraprofessional Total</b>			946.40	\$435,276.09

The total fees for the Second Interim Period are: \$7,390,359.47



**COMPENSATION BY PROFESSIONAL FOR  
FINAL PERIOD DECEMBER 6, 2023 THROUGH JULY 31, 2024**

<b>PROFESSIONALS</b>	<b>BLENDED RATE</b>	<b>TOTAL HOURS BILLED</b>	<b>TOTAL COMPENSATION</b>
Partners and Counsel (37)	\$1,352.63	3,491.20	\$4,722,304.18
Associates (47)	\$886.27	2,519.30	\$2,232,779.20
Paraprofessionals (16)	\$459.93	946.40	\$435,276.09
Blended Attorney Rate	\$1,157.16	6,010.50	\$6,955,083.38
Blended Rate for All Timekeepers	\$1,062.31	6,956.90	\$7,390,359.47

**COMPENSATION BY CATEGORIES FOR  
FINAL PERIOD DECEMBER 6, 2023 THROUGH JULY 31, 2024**

<b>TASK CODE</b>	<b>PROJECT CATEGORY</b>	<b>TOTAL HOURS BILLED</b>	<b>AMOUNT</b>
<b>B100</b>	Administration	491.50	\$644,036.89
<b>B110</b>	Case Administration	1,164.40	\$1,154,102.00
<b>B120</b>	Asset Analysis Recovery	57.90	\$63,454.28
<b>B130</b>	Asset Disposition	1,455.70	\$1,365,663.18
<b>B140</b>	Relief From Stay /Adequate Protection	19.30	\$24,895.50
<b>B150</b>	Meetings and Communications w/Creditors	52.20	\$73,110.00
<b>B160</b>	Fee/Employment Applications	471.90	\$389,166.00
<b>B170</b>	Fee/Employment Objections	1.50	\$697.50
<b>B185</b>	Assumption/Rejection of Leases and Contracts	15.20	\$12,538.85
<b>B190</b>	Other Contested Matters	752.30	\$734,508.38
<b>B195</b>	Non-Working Travel (Billed at 50% Rate)	140.80	\$104,888.00
<b>B210</b>	Business Operations	387.70	\$498,293.50
<b>B220</b>	Employee Benefits / Pensions	54.70	\$44,517.50
<b>B230</b>	Financing / Cash Collections	482.40	\$657,427.00

**COMPENSATION BY CATEGORIES FOR  
FINAL PERIOD DECEMBER 6, 2023 THROUGH JULY 31, 2024**

<b>B240</b>	Tax Issues	60.20	\$48,348.81
<b>B260</b>	Board of Directors Matters	10.40	\$5,283.84
<b>B300</b>	Claims and Plan	23.10	\$37,173.50
<b>B310</b>	Claims Administration and Objections	37.30	\$40,588.50
<b>B320</b>	Plan & Disclosure Statement	1,075.20	\$1,346,660.50
<b>B400</b>	Bankruptcy Related Advise	23.60	\$16,493.15
<b>B410</b>	General Bankruptcy Advice/Opinions	150.50	\$111,477.01
<b>B420</b>	Restructurings	29.10	\$17,035.58
<b>Total:</b>		<b>6,956.90</b>	<b>\$7,390,359.47</b>

<b>EXPENSE CATEGORY</b>	<b>TOTAL</b>
Airfare	\$9,220.36
Apostille Fees	\$2,879.35
Certified Copies	\$320.70
Computer Research	\$5,077.87
Copies	\$50.65
Courier/Messenger	\$1,046.02
CourtSolutions	\$3,570.00
Documents – Brazil	\$4,115.62
E-Discovery	\$1,221.72
Filing Fees	\$22,304.90
In-Flight Wi-Fi	\$116.00
Lien Search / Searches	\$1,302.00
Lodging	\$17,632.42
Meals	\$1,730.27
Outside Document Production	\$1,556.55
Parking	\$194.00
Transcripts	\$841.20
Translation	\$747.54
Transportation	\$5,534.08
VAT Charges for Vietnam	\$11,879.22
<b>Total:</b>	<b>\$91,340.47</b>

Paul J. Keenan Jr. (admitted *pro hac vice*)  
John R. Dodd (admitted *pro hac vice*)  
Reginald Sainvil (admitted *pro hac vice*)  
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*Counsel for the Debtors*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

Chapter 11

MERCON B.V.,<sup>1</sup>

Case No. 23-11947 (MEW)

Debtors.

/

**SECOND INTERIM AND FINAL FEE APPLICATION OF  
BAKER & MCKENZIE LLP AS ATTORNEYS FOR DEBTORS  
FOR ALLOWANCE AND PAYMENT OF COMPENSATION FOR  
PROFESSIONAL SERVICES RENDERED AND REIMBURSEMENT  
OF ACTUAL AND NECESSARY EXPENSES INCURRED FROM  
DECEMBER 6, 2023 THROUGH AND INCLUDING JULY 31, 2024**

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<sup>1</sup> On August 21, 2024, the Court entered the *Order Containing a Post-Confirmation Timetable as Required by Local Rule 3021-1*, closing the chapter 11 cases of Mercon Coffee Corporation and certain of its debtor affiliates and thereby directing that all motions, notices, and other pleadings related to any of the affiliated debtors be filed in this case. Prior to the Effective Date, the Debtors in these cases, along with the last four (4) digits of each Debtor's federal tax identification number, if applicable, were: Mercon Coffee Corporation (1844); Mercon B.V. (N/A); Mercon Brasil Comércio de Café Ltda. (N/A); Agro International Holding B.V. (N/A); Mercapital de Nicaragua, S.A. (N/A); Distribuidora de Granos de Nicaragua S.A. (N/A); Cisa Export S.A. (N/A); Comercial Internacional de Granos de Honduras, S.A. de C.V. (N/A); Mercon Guatemala, S.A. (N/A); Comercial Internacional Exportadora, S.A. (N/A). All docket numbers referenced herein refer to pleadings filed in Mercon Coffee Corporation, Case No. 23-11945 (MEW).

Baker & McKenzie LLP (“**Baker McKenzie**”), attorneys for Mercon Coffee Corporation and its debtor affiliates, as debtors and debtors in possession (collectively, the “**Debtors**”) in the chapter 11 cases, hereby submits this second interim and final application (“**Second Interim and Final Application**”) pursuant to sections 330(a) and 331 of the Bankruptcy Code, Bankruptcy Rule 2016, Rule 2016-1 of the Local Bankruptcy Rules for the Southern District of New York (the “**Local Rules**”), the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [Doc. No. 108] (the “**Interim Compensation Procedures Order**”), the *Amended Guidelines for Fees and Disbursements for Professionals in Southern District of New York Bankruptcy Cases*, dated January 29, 2013 (the “**Local Guidelines**”), and the *U.S. Trustee Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases*, effective November 1, 2013 (the “**UST Guidelines**” and, together with the Local Guidelines, the “**Fee Guidelines**”).

Baker McKenzie requests (a) the allowance of final compensation in the aggregate amount of \$7,390,359.47 in fees for reasonable and necessary professional services performed by Baker McKenzie for the Debtors during the period commencing December 6, 2023 through and including July 31, 2024 (the “**Final Compensation Period**”); (b) reimbursement of actual and necessary expenses in the aggregate amount of \$91,340.47 incurred by Baker McKenzie in connection with such services during the Final Compensation Period; (c) authority to receive the fees and expense reimbursement payments in the aggregate amount of \$7,381,699.94 (including approval of \$2,406,932.59 in fees and \$28,654.67 in expenses for the period April 1, 2024 through and including July 31, 2024) (the “**Second Interim Compensation Period**”); and (d) release of any amounts held back during the First Interim Compensation Period (the “**Holdback**”).

Baker McKenzie respectfully requests that the relief requested, including the release of the Holdback (or any portion of the Holdback to which there is no objection), be granted and all allowed amounts be paid to Baker McKenzie within ten (10) days of entry of an order approving this Second Interim and Final Application. In support of this Second Interim and Final Application, Baker McKenzie respectfully represents as follows:

### **Jurisdiction**

1. The Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the Amended Standing Order of Reference M-431, dated January 31, 2012 (Preska, C.J.). This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper before the Court pursuant to 28 U.S.C. §§ 1408 and 1409. The statutory and other predicates for the relief requested herein are sections 330 and 331 of the Bankruptcy Code, Bankruptcy Rule 2016, and Local Rule 2016-1.

2. This Second Interim and Final Application has been prepared in accordance with the Fee Guidelines and the Interim Compensation Procedures Order.<sup>2</sup> Attached hereto as **Exhibit A** is a certification regarding compliance with the Local Guidelines.

### **Background**

#### **A. The Debtors' Chapter 11 Cases**

3. On December 6, 2023 (the “**Petition Date**”), the Debtors commenced these cases (the “**Chapter 11 Cases**”) by filing voluntary petitions under chapter 11 the Bankruptcy Code.

4. On May 22, 2024, the Debtors filed the *Fourth Amended Disclosure Statement for Fourth Amended Joint Plan of Liquidation for Mercon Coffee Corporation and Certain Affiliated Debtors* [Docket No. 515] (the “**Disclosure Statement**”) and the *Fourth Amended Joint Chapter*

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<sup>2</sup> Capitalized terms not defined herein shall have the meanings set forth in the Interim Compensation Procedures Order.

*11 Plan of Liquidation for Mercon Coffee Corporation and Certain Affiliated Debtors* [Docket No. 514] (the “**Plan**”).

5. On July 30, 2024, this Court entered the *Findings of Fact, Conclusions of Law, and Order Confirming Fourth Amended Joint Chapter 11 Plan of Liquidation for Mercon Coffee Corporation and Certain Affiliated Debtors* [Docket No. 690] (the “**Confirmation Order**”).

6. On July 31, 2024, the effective date of the Plan occurred. *See* Docket No. 706. As of the effective date, and pursuant to the Confirmation Order, all of the Debtors’ Chapter 11 Cases were deemed closed, with the exception of the Chapter 11 Case of Mercon B.V., Case No. 23-11947 (MEW). Baker McKenzie understands that to date all quarterly fees due to the U.S. Trustee have been paid and all monthly operating reports have been filed.

7. Information regarding the Debtors’ business and capital structure and the circumstances leading to the commencement of these Chapter 11 Cases is set forth in the *Declaration of Harve Light, Chief Restructuring Officer (I) in Support of the Chapter 11 Petitions and First Day Pleadings and (II) Pursuant to Rule 1007-2*, dated December 7, 2023 [Doc. No. 17, amended by Doc. No. 92].

#### **B. Retention of Baker McKenzie**

8. On January 30, 2024, the Court entered the *Order Authorizing the Retention and Employment of Baker & McKenzie, LLP as Counsel to the Debtors and Debtors in Possession, as of the Petition Date* [Docket No. 170], a copy of which is attached hereto as Exhibit B (the “**Retention Order**”).

9. Baker McKenzie was retained because it had the resources and expertise necessary to assist the Debtors in protecting the interests of the Debtors and their estates and addressing, in real time, the myriad of issues that arose in these Chapter 11 Cases. Specifically, pursuant to the



terms of its retention, Baker McKenzie was retained to render the following legal services to the Debtors:

- a. advise the Debtors with respect to their rights, powers, and duties as debtors in possession in these Chapter 11 Cases;
- b. participate in in-person and telephonic meetings of the Debtors and any additional professionals or advisors retained by them;
- c. attend all meetings and negotiating with representatives, creditors, the U.S. Trustee, and other parties-in-interest;
- d. represent the Debtors in connection with obtaining authority to continue using cash collateral and postpetition financing;
- e. advise the Debtors in connection with any potential sale of assets;
- f. assist the Debtors in analyzing the Debtors' assets and liabilities, and assisting the Debtors in the preparation of Debtors' Schedules of Assets and Liabilities, Statement of Financial Affairs, and other reports required by the Debtors,
- g. advise the Debtors as foreign representative in proceedings commenced in Brazil and coordinate with Debtors' ordinary course and other professionals;
- h. advise the Debtors as foreign representative in proceedings commenced in Amsterdam and coordinate with Debtors' ordinary course and other professionals;
- i. negotiate and prepare a chapter 11 plan or plans of reorganization or liquidation and all related documents thereunder and transactions contemplated therein;
- j. assist the Debtors in analyzing claims asserted against, and interests in, the Debtors, and in negotiating with the holders of such claims and interests and bringing, or participating in, objections or estimation proceedings with respect to such claims and interests;
- k. providing legal advice regarding bankruptcy law, corporate law, corporate governance, transactional, litigation and other issues; and
- l. perform all other necessary legal services for the Debtors in connection with the prosecution of these Chapter 11 Cases, including: (i) analyzing the Debtors' leases and contracts and the assumption and assignment or rejection thereof; (ii) analyzing the validity of liens against the Debtors; and (iii) advising the Debtors on corporate and litigation matters.

Retention Order ¶ 3

10. Baker McKenzie's services in these cases have been substantial, necessary, and beneficial to the Debtors, their estates, creditors and other parties in interest. Throughout the application period, the variety and complexity of the issues involved and the need to promptly address those issues required Baker McKenzie in the discharge of its professional responsibilities, to devote substantial time by professionals from several legal disciplines on a daily basis.

11. Specifically, Baker McKenzie's requested compensation reflects the requisite time, skill and effort Baker McKenzie expended towards, among other things:

- a. ensuring a smooth transition into chapter 11 and obtaining all necessary first-day and second-day relief (including use of cash collateral);
- b. moving the Debtors through the chapter 11 process without undue delay;
- c. obtaining Court approval of multiple asset sales;
- d. obtaining approval of the Disclosure Statement, soliciting votes on the Plan, ensuring confirmation of the Plan and obtaining entry of the Confirmation Order; and
- e. successfully effectuating the Plan and transitioning control of the Debtors' estates to the Liquidating Trustee (as defined in the Plan), in accordance with the Plan and Confirmation Order.

12. A summary of the hours expended by each Baker McKenzie attorney and paraprofessional who rendered services to the Debtors during the Second Interim Compensation Period and during the Final Compensation Period, their practice group, respective hourly rates, and year of bar admission for each attorney, is attached at **Exhibit C**. A summary of the amount of compensation requested for the services rendered by Baker McKenzie on behalf of the Debtors during the Second Interim Compensation Period and during the Final Compensation Period organized by each matter is attached hereto as **Exhibit D**. Detailed narratives of the work performed by Baker McKenzie during the Second Interim Compensation Period are attached hereto as **Exhibit E**.

13. Baker McKenzie's partners and of counsel are billed at \$480 - \$1,645.00/hour, associates are billed at \$200 - \$1,125/hour, and law clerks, paralegals and legal assistants are billed at \$140 - \$485/hour.

**C. Disinterestedness of Baker McKenzie**

14. To the best of the Debtors' knowledge, and as disclosed in the *Declaration of Paul J. Keenan Jr. in Support of the Application of the Debtors for Entry of an Order Authorizing the Retention and Employment of Baker McKenzie as Counsel to the Debtors as of the Petition Date* [Docket No. 118, Exhibit C] (as supplemented from time to time, the "**Keenan Declaration**"), (a) Baker McKenzie is a "disinterested person" within the meaning of section 101(14) of the Bankruptcy Code, as required by section 327(a) of the Bankruptcy Code, and does not hold or represent an interest adverse to the Debtors' estates and (b) Baker McKenzie has no connection to the Debtors, their creditors, or other parties in interest, except as may be disclosed in the Keenan Declaration.

15. Baker McKenzie may have in the past represented, may currently represent, and likely in the future will represent parties in interest in connection with matters unrelated to the Debtors in the Chapter 11 Cases. In the Keenan Declaration, Baker McKenzie disclosed any known connections to parties in interest using its reasonable efforts.

16. Baker McKenzie performed the services for which it is seeking compensation on behalf of the Debtors and their estates, and not on behalf of any committee, creditor, or other entity.

17. Baker McKenzie has received no payment and no promises for payment from any source other than the Debtors for services provided or to be provided in any capacity whatsoever in connection with the Chapter 11 Cases.

18. Pursuant to Bankruptcy Rule 2016(b), Baker McKenzie has not shared, nor has Baker McKenzie agreed to share (a) any compensation it has received or may receive with another

party or person other than with the partners, counsel, and associates of Baker McKenzie or (b) any compensation another person or party has received or may receive.

**D. Interim Compensation and Payments Received**

19. In accordance with the entered Interim Compensation Procedures Order, Baker McKenzie filed and served six (6) monthly fee statements (collectively, the “**Monthly Fee Statements**”). Specifically, on February 23, 2024, Baker McKenzie filed the *First Monthly Fee Statement of Baker McKenzie for Compensation for Services Rendered and Reimbursement of Expenses Incurred as Counsel to the Debtors and Debtors in Possession for the Period from December 6, 2023 Through December 31, 2023* [Docket No. 198] (the “**First Fee Statement**”) and the *Second Monthly Fee Statement of Baker McKenzie for Compensation for Services Rendered and Reimbursement of Expenses Incurred as Counsel to the Debtors and Debtors in Possession for the Period from January 1, 2024 Through January 31, 2024* [Docket No. 199] (the “**Second Fee Statement**”). On March 30, 2024, Baker McKenzie filed and served the *Third Monthly Fee Statement of Baker McKenzie for Compensation for Services Rendered and Reimbursement of Expenses Incurred as Counsel to the Debtors and Debtors in Possession for the Period from February 1, 2024 Through February 29, 2024* [Docket No. 307] (the “**Third Fee Statement**”). On May 7, 2024, Baker McKenzie filed the *Fourth Monthly Fee Statement of Baker McKenzie for Compensation for Services Rendered and Reimbursement of Expenses Incurred as Counsel to the Debtors and Debtors in Possession for the Period from March 1, 2024 Through March 31, 2024* [Docket No. 422] (the “**Fourth Fee Statement**”). On June 7, 2024, Baker McKenzie filed the *Fifth Monthly Fee Statement of Baker McKenzie for Compensation for Services Rendered and Reimbursement of Expenses Incurred as Counsel to the Debtors and Debtors in Possession for the Period from April 1, 2024 Through April 30, 2024* [Docket No. 576] (the “**Fifth Fee Statement**”) and the *Sixth Monthly Fee Statement of Baker McKenzie for Compensation for*

*Services Rendered and Reimbursement of Expenses Incurred as Counsel to the Debtors and Debtors in Possession for the Period from May 1, 2024 Through May 31, 2024* [Docket No. 578] (the “**Sixth Fee Statement**”). As of the date of this Second Interim and Final Application, no party has objected to any of Baker McKenzie’s Monthly Fee Statements.

20. Services performed during the periods covered by the First Fee Statement, Second Fee Statement, Third Fee Statement, Fourth Fee Statement, Fifth Fee Statement, Sixth Fee Statement, Seventh Fee Statement, and Eighth Fee Statement are detailed in the respective Monthly Fee Statements on file with the Court.

21. In accordance with the Interim Compensation Procedures Order, if no objection is filed in connection with a Monthly Fee Statement, the Debtors were authorized to pay 80% of the amount of fees requested by the respective professional and 100% of the expenses incurred. Each Monthly Fee Statement submitted by Baker McKenzie has been subject to a 20% Holdback for fees requested. Baker McKenzie requested and was paid, subject to the Holdback, for the First through Sixth Fee Statements. The amount of expenses requested by Baker McKenzie in each of the Monthly Fee Statements has not been subject to the Holdback. The aggregate amounts unpaid (including the Holdbacks and entirety of the June and July fees and expenses) applicable to both the Second Interim Compensation Period and Final Compensation Period are \$1,875,419.75.

22. As of the filing of this Second Interim and Final Application, Baker McKenzie has received payments totaling \$1,296,931.07 in fees and \$13,236.43 in expenses on account of the Monthly Fee Statements for the Second Interim Compensation Period. As a result, together with the payments received on account of the First Interim Compensation Period, Baker McKenzie has received aggregate payments totaling \$5,430,357.96 in fees and \$75,922.23 in expenses during the Final Compensation Period. By this Second Interim and Final Application, Baker McKenzie is seeking final allowance of the fees and expenses requested in each of its Monthly Fee Statements,

and release of the Holdback amount withheld during the Final Compensation Period. This is Baker McKenzie's second application for allowance of interim compensation for services rendered and for reimbursement of expenses.

### **Summary of Relief Requested**

23. By this Second Interim and Final Application, Baker McKenzie seeks an order authorizing (a) allowance of final compensation for professional services as counsel to the Debtors in the aggregate amount of \$7,390,359.47 in fees for reasonable and professional services performed by Baker McKenzie during the Final Compensation Period (including \$2,406,932.59 for the Second Interim Compensation Period), on a final basis; (b) allowance of reimbursement of actual and necessary expenses incurred by Baker McKenzie in the amount of \$91,340.47 (including \$28,654.67 for the Second Interim Compensation Period), on a final basis; and (c) authority to receive the outstanding unpaid amounts, including any Holdback amount, exclusive of the Voluntary Fee Reduction (as defined herein).

24. As set forth in **Exhibit C** attached hereto, Baker McKenzie billed a gross total of \$7,390,359.47 in fees during the Final Compensation Period,<sup>3</sup> including \$2,406,932.59 in fees during the Second Interim Compensation Period. The fees reported in this Second Interim and Final Application reflect a blended hourly rate of \$1,157.16 for the Final Compensation Period and \$1,146.92 for the Second Interim Compensation Period (exclusive of paraprofessional time), which Baker McKenzie submits is reasonable given the nature of the issues confronted and the results achieved on behalf of the Debtors. The fees charged by Baker McKenzie in their representation of the Debtors are representative of the fees charged by comparably-skilled practitioners in cases other than cases under the Bankruptcy Code.

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<sup>3</sup> As noted in the cover sheet, to resolve informal comments received from the U.S. Trustee in respect of Baker McKenzie's first interim fee application, Baker McKenzie agreed to a voluntary fee reduction in the aggregate amount of \$100,000.00 (the "**Voluntary Fee Reduction**").

25. In support of this Second Interim and Final Application, and in accordance with Local Rule 2016-1, the Local Guidelines, and the U.S. Trustee Guidelines, Baker McKenzie has included the following supporting documentation, all of which is incorporated herein by reference:

**Exhibit Description**

- |   |   |
|---|---|
| A | Certification regarding compliance with the Local Guidelines.   |
| B | Retention Order.  |
| C | Schedule of hours expended by each Baker McKenzie attorney and paraprofessional who rendered services to the Debtors during the Final Compensation Period and Second Interim Compensation Period, their practice group, respective hourly rates, and year of bar admission for each attorney. |
| D | Summary of compensation requested by matter.  |
| E | Detailed narrative descriptions of the services rendered and a schedule setting forth the total number of hours expended by the attorneys and paraprofessionals on each matter, and the aggregate fees associated with each matter.   |
| F | Budget and Staffing Plan for the Second Interim Compensation Period (including summary of fees and hours budgeted for each matter compared to fees and hours actually billed for each matter).  |
| G | A summary and comparison of the aggregate blended hourly rates.   |
| H | A summary of expenses.  |
| I | A detailed statement of expenses incurred by Baker McKenzie from December 6, 2023 through July 31, 2024, for which Baker McKenzie is seeking reimbursement  |

**Summary of Services Performed and Expenses Incurred  
by Baker McKenzie During the Second Interim Compensation Period**

26. Set forth below is a description of significant professional services categorized by task code rendered by Baker McKenzie during the Second Interim Compensation Period. The following services described are not intended to be a comprehensive summary of the work performed by Baker McKenzie; a detailed description of all services rendered by Baker McKenzie

can be found in the detailed time records reflecting the services performed by Baker McKenzie's professionals; the time expended by each professional, and the hourly rate of each professional, annexed hereto as **Exhibit E**, and such descriptions are incorporated herein by reference.

a. Task Code: General Corporate Administration (B100)  
Fees: \$204,201.00 Total Hours: 153.00

- These tasks include, among other things, winding down the Debtors' operations and affairs, selling and otherwise disposing of assets, coordinating with overseas proceedings in Brazil and the Netherlands, and negotiating with numerous creditor constituencies regarding the same.

b. Task Code: Case Administration (B110)  
Fees: \$166,824.00 Total Hours: 175.10

- The administration of the Debtors' chapter 11 cases required significant coordination among the Debtors' management and other professionals. As a means of assessing the progress made in these cases, and to address a myriad of legal and other issues faced by the Debtors, conference calls and meetings regarding the general status of the cases were routinely among the Baker McKenzie team, as well as among the Debtors' personnel, other advisors to the Debtors, the Creditors' Committee, the Debtors' prepetition secured lenders and their advisors and other parties in interest. The purpose of these calls and meetings was to, among other things, discuss the status of the Debtors' sale and liquidation efforts, identify and address discrete issues affecting the Debtors and these cases, and provide necessary updates of information designed to assist all parties in providing their professional services efficiently.

c. Task Code: Asset Analysis Recovery (B120)  
Fees: \$19,349.50 Total Hours: 17.20

- These tasks involved identifying assets that can be monetized and determining a strategy for the sale of assets.

d. Task Code: Asset Disposition (B130)  
Fees: \$432,512.76 Total Hours: 547.50

- Baker McKenzie spent time on issues related to the Debtors' sale of their assets. These tasks involved marketing and selling the Debtors' assets, including the Debtors' operating companies in Vietnam, the Debtors' specialty coffee business and other assets. In connection with the sale of the Debtors' assets, Baker McKenzie (i) worked with the Debtors' other professionals to negotiate with potential



purchasers of the Debtors' assets; (ii) negotiated with potential objecting parties; (iii) obtained Court approval of the Debtors' de minimis asset sale motion [Docket No. 268]; and (iv) coordinated with the Debtors' key stakeholders on the various sale processes.

- e. Task Code: Relief From Stay /Adequate Protection (B140)  
Fees: \$15,340.00 Total Hours: 13.40
- These tasks involved prosecution of a motion to enforce the stay and responding to potential stay violations.
- f. Task Code: Meetings and Communications w/Creditors (B150)  
Fees: \$4,910.00 Total Hours: 3.20
- These tasks involved having telephone conferences with various secured and unsecured creditors and their counsel, including the Creditors' Committee.
- g. Task Code: Fee/Employment Applications (B160)  
Fees: \$54,542.50 Total Hours: 104.50
- These tasks included negotiations of the terms of retention for numerous estate and ordinary course professionals, including foreign law firms and accounting firms, and also responding to inquiries regarding these retentions from the U.S. Trustee and various creditors.
- h. Task Code: Assumption/Rejection of Leases and Contracts (B185)  
Fees: \$5,624.85 Total Hours: 6.60
- Baker McKenzie advised the Debtors concerning their rights and obligations in connection with various executory contracts and unexpired leases during the pendency of these Chapter 11 Cases. Accordingly, these tasks involved analysis of contracts and releases for potential assumption or rejection. In addition, Baker McKenzie assisted the Debtors in preparing the cure schedules in connection with the assumption and assignment of executory contracts and unexpired leases identified in the Plan and various asset purchase agreements.
- i. Task Code: Other Contested Matters (B190)  
Fees: \$107,489.87 Total Hours: 116.00
- These tasks involved analysis, correspondence and meetings regarding pending and threatened creditor actions in the U.S. and abroad, and also the pending concurrent bankruptcy proceeding in the Netherlands and an ancillary proceeding for recognition in

Brazil. These tasks also included document review in response to a request for documents from the Creditors' Committee.

- j. Task Code: Non-Working Travel (Billed at 50% Rate) (B195)  
Fees: \$18,293.75 Total Hours: 23.50
- This time is for non-working travel, primarily to meet with the Chief Restructuring Officer in New York for hearings and 341 meetings.
- k. Task Code: Business Operations (B210)  
Fees: \$12,361.50 Total Hours: 11.10
- These tasks involved correspondence, analysis and conferences concerning the Debtors' ongoing sale of inventory, and actions required to wind down operations in anticipation of a plan of liquidation, and also issues involving the wind down of derivative contracts.
- l. Task Code: Employee Benefits / Pensions (B220)  
Fees: \$1,200.00 Total Hours: 4.40
- These tasks involved correspondence, analysis and conferences primarily regarding compliance with the employment laws of foreign countries where the Debtors conducted business.
- m. Task Code: Financing / Cash Collections (B230)  
Fees: \$42,669.00 Total Hours: 31.40
- Baker McKenzie attorneys assisted the Debtors with the consensual use of cash collateral. Baker McKenzie also participated in regular meetings with the Debtors' secured lenders and their professionals and provided numerous reporting to the Debtors' secured lenders in connection therewith. These tasks involved the 13-week cash budgets and other financial reporting, and collections on accounts receivable.
- n. Task Code: Tax Issues (B240)  
Fees: \$9,233.50 Total Hours: 16.80
- These tasks involved analysis of applicable U.S. and foreign tax laws in connection with the Debtors' tax obligations and the anticipated plan of liquidation.
- o. Task Code: Board of Directors Matters (B260)  
Fees: \$4,037.12 Total Hours: 8.10

- These tasks involved communications with board members regarding the pendency of the chapter 11 bankruptcy case, and related cases in foreign countries.
- p. Task Code: Claims Administration and Objections (B310)  
Fees: \$13,208.00 Total Hours: 11.00
- These tasks involved analysis of claims asserted against the Debtors.
- q. Task Code: Plan & Disclosure Statement (B320)  
Fees: \$1,245,740.50 Total Hours: 995.40
- Baker McKenzie devoted considerable attention to matters related to the Plan and the Disclosure Statement across a number of practice areas. Such endeavors included formulating, negotiating, drafting and filing revised versions of the Plan, Disclosure Statement, plan supplement documents and Confirmation Order. Preparing for confirmation of the Plan required Baker McKenzie to engage in negotiations with several parties in interest and to draft and file a comprehensive memorandum of law in support of confirmation on the Debtors' behalf. In addition, Baker McKenzie attorneys prepared for and participated in multiple meetings with the Debtors' key stakeholders in connection with the plan process.
- r. Task Code: Bankruptcy Related Advice (B400)  
Fees: \$2,681.65 Total Hours: 5.30
- These tasks involved communicating with the Chief Restructuring Officer and senior management team regarding various issues arising under U.S. and foreign bankruptcy law.
- s. Task Code: General Bankruptcy Advice/Opinions (B410)  
Fees: \$46,015.59 Total Hours: 64.00
- These tasks involved communicating with the Chief Restructuring Officer and senior management team regarding various issues arising under U.S. and foreign bankruptcy law.

27. The professional services performed by Baker McKenzie during the Second Interim Compensation Period represent actual, necessary services rendered by Baker McKenzie in connection with the representation of the Debtors in the Chapter 11 Cases. Compensation for the foregoing services as requested is commensurate with the complexity, importance and nature of the problems, issues or tasks.

28. During the Second Interim Compensation Period, Baker McKenzie incurred actual and necessary expenses in rendering legal services to the Debtors in the amount of \$28,654.67. An itemization of these out-of-pocket expenses can be found in each Monthly Fee Statement on file with the Court, and a summary of such expenses is also attached at **Exhibit H**, which is incorporated herein by reference. These charges are intended to cover Baker McKenzie's direct costs for such expenses, which costs are not incorporated into the firm's hourly fees.

29. Baker McKenzie submits that the actual expenses incurred for which reimbursement is sought in this Second Interim and Final Application were necessary, reasonable, and justified under the circumstances to serve the needs of the Debtors at the time such expenses were incurred.

#### **Basis for the Relief Requested**

30. Section 331 of the Bankruptcy Code provides for interim compensation of professionals and incorporates the substantive standards of section 330 to govern the Court's award of such compensation. 11 U.S.C. § 331. Section 330 provides that a court may award a professional employed under section 327 of the Bankruptcy Code "reasonable compensation for actual necessary services rendered . . . and reimbursement for actual, necessary expenses." *Id.* § 330(a)(1)(A). Section 330(a)(3) sets forth the criteria for the award of such compensation and reimbursement:

In determining the amount of reasonable compensation to be awarded to an examiner, trustee under chapter 11, or professional person, the court shall consider the nature, the extent, and the value of such services, taking into account all relevant factors, including—

- a. the time spent on such services;
- b. the rates charged for such services;
- c. whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of, a case under this title;

- d. whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed;
- e. with respect to a professional person, whether the person is board certified or otherwise has demonstrated skill and experience in the bankruptcy field; and
- f. whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title.

31. Moreover, courts should be mindful that professionals “must make practical judgments, often with severe time constraints, on matters of staffing, assignments, coverage of hearings and meetings, and a wide variety of similar matters.” *In re Drexel Burnham Lambert Group, Inc.*, 133 B.R. 13, 23 (Bankr. S.D.N.Y. 1991). These judgments are presumed to be made in good faith. *Id.*

32. Here, Baker McKenzie respectfully submits that the services for which it seeks compensation and the expenses for which it seeks reimbursement in the Second Interim and Final Application were necessary for and beneficial to the Debtors and their estates. The services rendered by Baker McKenzie required substantial time and effort, and were actual and necessary services. The services rendered were performed diligently and efficiently. When possible, Baker McKenzie delegated tasks to lower cost junior attorneys or, for discrete matters, to attorneys with specialized expertise in the particular task at issue. While that approach may have required intra-office conferences or involved individual attorneys who spent only a few hours on the matter at hand, the net result was enhanced cost efficiency.

33. In many instances, Baker McKenzie was able to successfully resolve disputes without the need to resort to the Court. When necessary, however, Baker McKenzie actively represented the Debtors’ interests before the Court, facilitated the Debtors’ day-to-day operations during these Chapter 11 Cases, and substantially furthered the Debtors’ chapter 11 efforts while preserving the value of the Debtors’ estates for their creditors.

34. During the Final Compensation Period, Baker McKenzie encountered a variety of challenging legal issues, often requiring substantial research and negotiation. In particular, the Debtors had to address a number of complex legal and business situations relating to, among other things, the maximization of the Debtors' assets for the benefit of their stakeholders through the marketing and sale of various assets, the seizure of assets of Debtors Mercapital de Nicaragua, S.A. and CISA on account of an alleged \$30 million dollar tax claim on behalf of the National Taxing Authority, and commencement of a parallel proceeding under the *Dutch Wet Homologatie Onderhands Akkoord* to protect the significant interests of Debtor Mercon B.V. in The Netherlands and other European Union countries in which it had assets. The Debtors optimally and efficiently pivoted to the development and prosecution of their chapter 11 plan of liquidation, conserving valuable estate assets for distribution to their creditors. Accordingly, the provision of such services and expenditures were necessary, appropriate, and in the best interests of the Debtors and their estates. In light of the nature, extent, and value of such services to the Debtors, Baker McKenzie submits that the compensation requested herein is reasonable.

35. Compensation for the foregoing services as requested is commensurate with the complexity, importance and nature of the problems, issues and tasks involved. The professional services were performed expediently and efficiently. Whenever possible, Baker McKenzie sought to minimize the costs of its services to the Debtors by utilizing junior attorneys and paraprofessionals to handle more routine aspects of case administration. Groups of the same Baker McKenzie attorneys were utilized for similar tasks in these cases to minimize the costs of intra-Baker McKenzie communication and groups of specialized attorneys were utilized to administer specific issues within their area of expertise to leverage their wealth of experience and knowledge. Attached hereto as **Exhibit C** is a schedule of the hours expended by each attorney and

paraprofessional during the Second Interim Compensation Period and the Final Compensation Period, their normal hourly rates, and the value of their services.

36. The fees charged by Baker McKenzie in the Chapter 11 Cases were billed in accordance with the firm's existing billing rates and procedures in effect during the Second Interim Compensation Period and the Final Compensation Period and the hourly rates set forth on **Exhibit C** are Baker McKenzie's standard hourly rates for work of this nature. These rates are set at a level designated to fairly compensate Baker McKenzie for the work of its attorneys and paraprofessionals and to cover fixed and routine overhead expenses. Baker McKenzie operates in a complicated, national marketplace for legal services in which rates are driven by multiple factors relating to the individual lawyer, such lawyer's area of specialization, the firm's expertise, performance and reputation, the nature of the work involved and other factors. Accordingly, Baker McKenzie sets its rates annually for attorneys and paraprofessionals both in the bankruptcy group and other practice groups within the firm by reference to various annual market surveys. Based on this and other sources, including reviews of contemporaneous time records and fee applications filed in these cases and other cases, Baker McKenzie endeavors to set the hourly rates for its attorneys and paraprofessionals at levels equal to the market standard and those of its principal competitor firms. Moreover, the rates Baker McKenzie charges for the services rendered by its attorneys and paraprofessionals in the Chapter 11 Cases were the same rates that Baker McKenzie charges for attorneys and paraprofessional services rendered in comparable non-bankruptcy related matters. Such fees are reasonable based on the customary compensation charged by comparably skilled practitioners in comparable non-bankruptcy cases in a competitive national legal market.

37. In sum, Baker McKenzie submits that the services rendered by Baker McKenzie were necessary and beneficial to the Debtors, were consistently performed in a timely and efficient

manner, without duplication of services, and were reasonable in light of the value of such services to the Debtors, Baker McKenzie's demonstrated skill and expertise in the bankruptcy field, and the customary compensation charged by comparably skilled practitioners at Baker McKenzie. Accordingly, Baker McKenzie submits that approval of the compensation for professional services and reimbursement of expenses sought herein is warranted.

### **Budget and Staffing Plan**

38. In connection with its retention in the Chapter 11 Cases and this Second Interim and Final Application, Baker McKenzie prepared a budget and staffing plan. Baker McKenzie prepared the budget and staffing plan (the "**Budget and Staffing Plan**") using a good faith estimate of the fees Baker McKenzie expected to incur on account of its representation of the Debtors during the Second Interim Compensation Period. Budget and staffing plans, by their nature, are speculative, particularly in the context of large chapter 11 cases such as these, which commonly involve conflicting interests of numerous and diverse constituents. During the Second Interim Compensation Period, Baker McKenzie's fees were within the amounts estimated in the Budget and Staffing Plan.

39. A copy of the Budget and Staffing Plan is attached hereto as **Exhibit F**. A summary comparison of the fees and hours budgeted to the fees and hours actually billed is incorporated into **Exhibit F**.

40. In accordance with section 504 of the Bankruptcy Code and Rule 2016 of the Bankruptcy Rules, no agreement or understanding exists between Baker McKenzie and any other person for the sharing of compensation received or to be received for services rendered in or in connection with these cases, and no agreement or understanding prohibited by 18 U.S.C. § 155 has been made by Baker McKenzie.



**Statements Pursuant to Appendix B of the UST Guidelines**

41. The following statements address information required pursuant to Section C.5 of the U.S. Trustee Guidelines:

- a. **Question:** Did you agree to any variations from, or alternatives to, your standard or customary billing rates, fees or terms for services pertaining to this engagement that were provided during the application period? If so, please explain.

**Answer:** No.

- b. **Question:** If the fees sought in this fee application as compared to the fees budgeted for the time period covered by this fee application are higher by 10% or more, did you discuss the reasons for the variation with the client?

**Answer:** The fees sought by this Second Interim and Final Application do not exceed the budgeted fees.

- c. **Question:** Have any of the professionals included in this fee application varied their hourly rate based on the geographic location of the bankruptcy case?

**Answer:** No.

- d. **Question:** Does the fee application include time or fees related to reviewing or revising time records or preparing, reviewing, or revising invoices? (This is limited to work involved in preparing and editing billing records that would not be compensable outside of bankruptcy and does not include reasonable fees for preparing a fee application). If so, please quantify by hours and fees.

**Answer:** No.

- e. **Question:** Does this fee application include time or fees for reviewing time records to redact any privileged or other confidential information? If so, please quantify by hours and fees.

**Answer:** No.

- f. **Question:** If the fee application includes any rate increases since retention: (i) Did your client review and approve those rate increases in advance? (ii) Did your client agree when retaining the law firm to accept all future rate increases? If not, did you inform your client that they need not agree to modified rates or terms in order to have you continue the representation, consistent with ABA Formal Ethics Opinion 11-458?

**Answer:** No.

**Notice and No Prior Request**

42. Pursuant to the Interim Compensation Procedures Order, notice of this Second Interim and Final Application has been served upon:

- a. The Debtors c/o Mercon Coffee Corporation, Attn: Harve Light (email: harve.light@riveron.com);
- b. Counsel for the Offices of the United States Trustee for the Southern District of New York, Alexander Hamilton Custom House, One Bowling Green, Suite 515, New York, New York 10004, Attn: Daniel Rudewicz (email: daniel.rudewicz@usdoj.gov); and
- c. Counsel to the Official Committee of Unsecured Creditors, O'Melveny & Myers, LLP, Attn: Gregory M. Wilkes, Scott P. Drake, 2801 North Harwood Street, Suite 1600, Dallas, Texas, 75201, gwilkes@omm.com, sdrake@omm.com and Attn: Louis R. Strubeck, Jr., Matthew P. Kremer, 7 Times Square, New York, New York, 10036, lstrubeckjr@omm.com, mkremer@omm.com; and
- d. Counsel to Coöperative Rabobank U.A., New York Branch, as administrative agent under the Debtors' prepetition first lien credit agreement, Cadwalader, Wickersham & Taft LLP (Attn: Ingrid Bagby and Andrew Greenberg).

WHEREFORE, Baker McKenzie respectfully requests that the Court enter an Order (a) approving Baker McKenzie's compensation for professional services rendered as counsel to the Debtors in the aggregate amount of \$7,390,359.47 in fees for reasonable and necessary professional services performed by Baker McKenzie for the Debtors during the Final Compensation Period; (b) granting, on a final basis, reimbursement of actual and necessary expenses in the aggregate amount of \$91,340.47 incurred by Baker McKenzie; (c) authorizing the Debtors to pay to Baker McKenzie the amounts allowed pursuant to this Second Interim and Final Application; and (d) granting such other and further relief as the Court deems just and proper.

Dated: August 30, 2024

**BAKER & McKENZIE LLP**

By: /s/ Reginald Sainvil

Paul J. Keenan Jr. (admitted *pro hac vice*)

John R. Dodd (admitted *pro hac vice*)

Reginald Sainvil (admitted *pro hac vice*)

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Email: blaire.cahn@bakermckenzie.com

*Counsel for the Debtors*

**Exhibit A**

**Certification**

Paul J. Keenan Jr. (admitted *pro hac vice*)  
John R. Dodd (admitted *pro hac vice*)  
Reginald Sainvil (admitted *pro hac vice*)  
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Facsimile: 212-310-1600  
Email: blaire.cahn@bakermckenzie.com

*Counsel for the Debtors*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

Chapter 11

MERCON B.V.,<sup>1</sup>

Case No. 23-11947 (MEW)

Debtors.

/

**CERTIFICATION OF PAUL J. KEENAN JR. IN SUPPORT OF SECOND INTERIM  
AND FINAL APPLICATION OF BAKER & MCKENZIE LLP AS ATTORNEYS  
FOR DEBTORS FOR ALLOWANCE AND PAYMENT OF COMPENSATION  
FOR PROFESSIONAL SERVICES RENDERED AND REIMBURSEMENT  
OF ACTUAL AND NECESSARY EXPENSES INCURRED FROM  
DECEMBER 6, 2023 THROUGH AND INCLUDING JULY 31, 2024**

<sup>1</sup> On August 21, 2024, the Court entered the *Order Containing a Post-Confirmation Timetable as Required by Local Rule 3021-1*, closing the chapter 11 cases of Mercon Coffee Corporation and certain of its debtor affiliates and thereby directing that all motions, notices, and other pleadings related to any of the affiliated debtors be filed in this case. Prior to the Effective Date, the Debtors in these cases, along with the last four (4) digits of each Debtor's federal tax identification number, if applicable, were: Mercon Coffee Corporation (1844); Mercon B.V. (N/A); Mercon Brasil Comércio de Café Ltda. (N/A); Agro International Holding B.V. (N/A); Mercapital de Nicaragua, S.A. (N/A); Distribuidora de Granos de Nicaragua S.A. (N/A); Cisa Export S.A. (N/A); Comercial Internacional de Granos de Honduras, S.A. de C.V. (N/A); Mercon Guatemala, S.A. (N/A); Comercial Internacional Exportadora, S.A. (N/A). All docket numbers referenced herein refer to pleadings filed in Mercon Coffee Corporation, Case No. 23-11945 (MEW).

I, Paul J. Keenan Jr., hereby certify that:

1. I am a partner of the applicant firm, Baker & McKenzie LLP (“**Baker McKenzie**”), which serves as attorneys for Mercon Coffee Corporation and its debtor subsidiaries, as debtors and debtors in possession (collectively, the “**Debtors**”), in the chapter 11 cases.

2. This Certification (the “**Certification**”) is made in respect of Baker McKenzie’s compliance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals*, dated January 11, 2024 [Doc. No. 108] (the “**Interim Compensation Procedures Order**”), the *Amended Guidelines for Fees and Disbursements for Professionals in Southern District of New York Bankruptcy Cases*, dated January 29, 2013 (the “**Local Guidelines**”), and the *U.S. Trustee Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases*, effective November 1, 2013 (the “**UST Guidelines**” and, together with the Interim Compensation Procedures Order and the Local Guidelines, the “**Fee Guidelines**”).

3. This Certification is made in connection with Baker McKenzie’s application, submitted on the date hereof (the “**Application**”), for final compensation and reimbursement of expenses for the period commencing December 6, 2023 through and including July 31, 2024 (the “**Compensation Period**”).<sup>2</sup>

4. Pursuant to section B(1) of the Local Guidelines, I certify that:

- a. I have read the Application.
- b. To the best of my knowledge, information, and belief formed after reasonable inquiry, the fees and disbursements sought fall within the Fee Guidelines.
- c. To the best of my knowledge, information, and belief formed after reasonable inquiry, the fees and disbursements sought are billed at rates in

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<sup>2</sup> Capitalized terms used herein but not otherwise defined shall have the meanings ascribed to them in the Application.

accordance with those customarily charged by Baker McKenzie and generally accepted by Baker McKenzie's clients.

- d. To the best of my knowledge, information, and belief formed after reasonable inquiry, in providing a reimbursable service, Baker McKenzie does not make a profit on that service, whether the service is performed by Baker McKenzie in-house or through a third party.

5. Pursuant to section B(2) of the Local Guidelines, and as required by the Interim Compensation Procedures Order, I certify that, to the best of my knowledge, information, and belief formed after reasonable inquiry, Baker McKenzie has complied with provisions requiring it to provide the Debtors, counsel for the Official Committee of Unsecured Creditors (the "**Creditors' Committee**") and the United States Trustee for the Southern District of New York (the "**U.S. Trustee**") with statements of Baker McKenzie's fees and disbursements accrued during the previous months through the period ending July 31, 2024.

6. Pursuant to section B(3) of the Local Guidelines, I certify that the Debtors, the Creditors' Committee, and the U.S. Trustee are each being provided with a copy of the Application.

7. **Exhibit B** shows Baker McKenzie's budget and a discussion of its staffing plan. Baker McKenzie discussed its rates, fees, and staffing with the Debtors at the outset of these cases. Furthermore, at the outset of these cases, Baker McKenzie provided estimates to the Debtors and Riveron, the Debtors' financial advisor, of Baker McKenzie's expected budget, on a 13-week basis.

8. In accordance with the UST Guidelines, Baker McKenzie responds to the questions identified therein as follows:

- Question 1: Did Baker McKenzie agree to any variations from, or alternatives to, Baker McKenzie's standard or customary billing rates, fees or terms for services pertaining to this engagement that were provided during the Compensation Period? If so, please explain.

Answer: No.

Question 2: If the fees sought in the Application as compared to the fees budgeted for the time period covered by the Application are higher by 10% or more, did Baker McKenzie discuss the reasons for the variation with the client?

Answer: To the extent that the fees incurred exceeded the budget, the matter was discussed with the Chief Restructuring Officer.

Question 3: Have any of the professionals included in the Application varied their hourly rate based on geographic location of the bankruptcy case?

Answer: No

Question 4: Does the Application include time or fees related to reviewing or revising time records or preparing, reviewing or revising invoices? If so, please quantify by hours and fees.

Answer: No

Question 5: Does the Application include time or fees for reviewing time records to redact any privileged or other confidential information? If so, please quantify hours and fees.

Answer: No

Question 6: Does the Application include any rate increases since Baker McKenzie's retention in these cases? If so, did the client review and approve those rate increases in advance? Did the client agree when retaining Baker McKenzie to accept all future rate increases?

Answer: No

Dated: August 30, 2024

/s/ Paul J. Keenan

Paul J. Keenan Jr.

Baker & McKenzie LLP



**Exhibit B**

**Retention Order**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

Chapter 11

MERCON COFFEE CORPORATION, *et al.*,<sup>1</sup>

Case No. 23-11945 (MEW)

Debtor.

Jointly Administered

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**ORDER AUTHORIZING THE RETENTION AND EMPLOYMENT  
OF BAKER & MCKENZIE, LLP AS COUNSEL TO THE DEBTORS  
AND DEBTORS IN POSSESSION, AS OF THE PETITION DATE**

Upon the application filed January 12, 2024 [Doc. No. 118] (the “**Application**”)<sup>2</sup> of the debtors and debtors in possession (the “**Debtors**”) for entry of an order, pursuant to sections 327(a), 328(a) and 1107(b) of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (the “**Bankruptcy Code**”), Rules 2014(a), 2016(b), and 5002 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), and Rule 2014-1 and 2016-1 of the Local Bankruptcy Rules for the Southern District of New York (the “**Local Rules**”), authorizing the retention and employment of Baker & McKenzie LLP (“**Baker McKenzie**”) as counsel to the Debtors as of the Petition Date; the Court, having reviewed the Application, the *Declaration of Paul J. Keenan Jr. in Support of the Application for Entry of an Order Authorizing the Retention and Employment of Baker McKenzie as Counsel to the Debtors and Debtors in Possession, as of the Petition Date*, annexed to the Application as Exhibit C, and the *Declaration of Gledson Campos in Support of the Application for Entry of an Order Authorizing the Retention and Employment of Trench Rossi*

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four (4) digits of each Debtor’s federal tax identification number, if applicable, are: Mercon Coffee Corporation (1844); Mercon B.V. (N/A); Mercon Brasil Comércio de Café Ltda. (N/A); Agro International Holding B.V. (N/A); Mercapital de Nicaragua, S.A. (N/A); Distribuidora de Granos de Nicaragua S.A. (N/A); Cisa Export S.A. (N/A); Comercial Internacional de Granos de Honduras, S.A. de C.V. (N/A); Mercon Guatemala, S.A. (N/A); Mercafe Vietnam LTD. (N/A); Comercial Internacional Exportadora, S.A. (N/A). The Debtors’ mailing address is: 999 Ponce de Leon Blvd, Suite 910, Coral Gables, FL 33134.

<sup>2</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Application.

*as Counsel to the Debtors and Debtors in Possession, as of the Petition Date*, annexed to the Application as Exhibit D; and the Court having conducted a hearing on the Application on January 30, 2024, finds that the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334, that this is a core matter pursuant to 28 U.S.C. § 157(b)(2), that notice of the Application was sufficient under the circumstances, and that no further notice need be given, and the legal and factual bases set forth in the Application established just cause for the relief granted herein;

**IT IS HEREBY ORDERED THAT:**

1. For the reasons set forth herein, the Application is GRANTED to the extent forth herein.
2. Pursuant to sections 327(a) and 328 of the Bankruptcy Code, Rules 2014(a) and 2016, and Local Rules 2014-1 and 2016-1, the Debtors are hereby authorized to retain and employ Baker McKenzie as counsel effective as of the Petition Date.
3. Baker McKenzie is authorized to provide the following services:
  - (a) advise the Debtors with respect to their rights, powers, and duties as debtors in possession in these Chapter 11 Cases;
  - (b) participate in in-person and telephonic meetings of the Debtors and any additional professionals or advisors retained by them;
  - (c) attend all meetings and negotiating with representatives, creditors, the United States Trustee, and other parties-in-interest;
  - (d) represent the Debtors in connection with obtaining authority to continue using cash collateral and postpetition financing;
  - (e) advise the Debtors in connection with any potential sale of assets;
  - (f) assist the Debtors in analyzing the Debtors' assets and liabilities, and assisting the Debtors in the preparation of Debtors' Schedules of Assets and Liabilities, Statement of Financial Affairs, and other reports required by the Debtors,

- (g) advise the Debtors as foreign representative in proceedings commenced in Brazil and coordinate with Debtors' ordinary course and other professionals;
- (h) advise the Debtors as foreign representative in proceedings commenced in Amsterdam and coordinate with Debtors' ordinary course and other professionals;
- (i) negotiate and prepare a chapter 11 plan or plans of reorganization or liquidation and all related documents thereunder and transactions contemplated therein;
- (j) assist the Debtors in analyzing claims asserted against, and interests in, the Debtors, and in negotiating with the holders of such claims and interests and bringing, or participating in, objections or estimation proceedings with respect to such claims and interests;
- (k) providing legal advice regarding bankruptcy law, corporate law, corporate governance, transactional, litigation and other issues; and
- (l) perform all other necessary legal services for the Debtors in connection with the prosecution of these Chapter 11 Cases, including: (i) analyzing the Debtors' leases and contracts and the assumption and assignment or rejection thereof; (ii) analyzing the validity of liens against the Debtors; and (iii) advising the Debtors on corporate and litigation matters.

4. Baker McKenzie shall be compensated and will file interim and final fee applications for allowance of its compensation and expenses and shall be subject to sections 330 and 331 of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and applicable law.

5. Prior to any increases in Baker McKenzie's rates for any individual retained by Baker McKenzie and providing services in these Chapter 11 Cases, Baker McKenzie shall file a supplemental declaration with the Court and provide 10 business days' notice to the Debtors, the U.S. Trustee and the members of the Official Committee of Unsecured Creditors appointed in these Chapter 11 Cases which supplemental declaration shall explain the basis for the requested rate increases in accordance with Section 330(a)(3)(F) of the Bankruptcy Code and state whether Professional's client has consented to the rate increase. The Debtors, the U.S. Trustee, the Official Committee of Unsecured Creditors, and all parties in interest retain all rights to object to any rate

increase on all grounds including, but not limited to, the reasonableness standard provided for in section 330 of the Bankruptcy Code, and the Court retains the right to review any rate increase pursuant to section 330 of the Bankruptcy Code

6. Baker McKenzie shall make a reasonable effort to comply with the U.S. Trustee's requests for information and additional disclosures as set forth in the *Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases Effective as of November 1, 2013*, in connection with any interim or final fee applications it files in the Chapter 11 Cases.

7. Baker McKenzie shall make reasonable efforts to avoid the duplication of services provided by any of the Debtors' other retained Professionals in these Chapter 11 Cases.

8. Baker McKenzie will not charge the estate(s) for time spent preparing, reviewing the invoices or time records submitted in support of any monthly fee statements or fee applications.

9. To the extent the Application is inconsistent with this Order, the terms of this Order shall govern.

10. The terms of this Order shall be immediately effective and enforceable upon its entry.

11. The Court shall retain jurisdiction to hear and determine all matters arising from or relating to the interpretation or implementation of this Order.

Dated: January 30, 2024  
New York, New York

s/Michael E. Wiles  
HONORABLE MICHAEL E. WILES  
UNITED STATES BANKRUPTCY JUDGE

**Exhibit C**

**Summary of Hours by Professionals / Paraprofessionals  
[Second Interim Period]**

NAME OF PROFESSIONAL	POSITION	DEPARTMENT	YEAR ADMITTED	HOURLY BILLING RATE	TOTAL HOURS BILLED	TOTAL COMPENSATION
Adam Aft (IL)	Partner	Intellectual Property & Technology Law	2015	\$1,225.00	1.10	\$1,347.50
Adriana Stamato (São Paulo)	Partner	Tax	2000	\$750.00	1.00	\$750.00
Blaire Cahn (NY)	Partner	Restructuring & Insolvency	2009	\$1,345.00	4.10	\$5,514.50
Cecilia Pastor (Madrid)	Partner	Trade & Commerce	1989	\$670.14 <sup>1</sup>	.50	\$335.07
Clare Montgomery (Bogota)	Partner	Commercial Contracts, Real Estate	1994	\$740.00	.60	\$444.00
Federico Cuadra Del Carmen (FL)	Partner	Corporate & Securities	2014	\$1,345.00	201.30	\$270,748.50
Gledson Marques de Campos (Sao Paulo)	Partner	Litigation/Arbitration & Dispute Resolution	2000	\$850.00	46.70	\$39,695.00
Hoang Anh Nguyen (Ho Chi Minh City)	Of Counsel	Employment & Compensation	2023	\$480.00	31.20	\$14,976.00
Jacob Kaplan (NY)	Partner	Litigation/Arbitration & Dispute Resolution	2003	\$1,295.00	16.40	\$21,238.00
John R. Dodd (FL)	Partner	Restructuring & Insolvency	2007	\$1,345.00	86.20	\$115,939.00
John R. Dodd (FL)	Partner	Restructuring & Insolvency	2007	\$672.50 <sup>2</sup>	6.90	\$4,640.25

<sup>1</sup> Average Estimated Rate in USD

<sup>2</sup> Rate reduced by 50% for non-working travel time.



<b>NAME OF PROFESSIONAL</b>	<b>POSITION</b>	<b>DEPARTMENT</b>	<b>YEAR ADMITTED</b>	<b>HOURLY BILLING RATE</b>	<b>TOTAL HOURS BILLED</b>	<b>TOTAL COMPENSATION</b>
Kai Kramer (TX)	Partner	Tax	2005	\$1,545.00	.70	\$1,081.50
Kevin Whittam (NY)	Partner	Banking & Finance	2015	\$1,345.00	3.90	\$5,245.50
Kim Tan (Amsterdam)	Partner	Corporate Reorganizations	1999 <sup>3</sup>	\$827.16 <sup>1</sup>	1.80	\$1,488.89
Mark Bloom (FL)	Partner	Restructuring & Insolvency	1980	\$1,645.00	123.00	\$202,335.00
Matthew Smith (NY)	Of Counsel	Banking & Finance	2012	\$1,295.00	7.80	\$10,101.00
Oanh Nguyen (Ho Chi Minh City)	Partner	Banking & Finance	1999	\$950.00	12.60	\$11,970.00
Paul J. Keenan Jr. (FL)	Partner	Restructuring & Insolvency	2002	\$1,645.00	327.40	\$538,573.00
Paul J. Keenan Jr. (FL)	Partner	Restructuring & Insolvency	2002	\$822.50 <sup>2</sup>	16.60	\$13,653.50
Ronald Ohren (IL)	Of Counsel	Litigation/Arbitration & Dispute Resolution	1986	\$1,270.00	1.00	\$1,270.00
Ross Staine (TX)	Partner	Tax	2014	\$1,295.00	.70	\$906.50
Silvia Bernardino (Sao Paulo)	Partner	Mergers, Acquisitions, Corporate Finance	2008	\$685.00	10.00	\$6,850.00

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<sup>3</sup> Civil Law Notary

<b>NAME OF PROFESSIONAL</b>	<b>POSITION</b>	<b>DEPARTMENT</b>	<b>YEAR ADMITTED</b>	<b>HOURLY BILLING RATE</b>	<b>TOTAL HOURS BILLED</b>	<b>TOTAL COMPENSATION</b>
Steven Canner (NY)	Partner	Corporate & Securities	1991	\$1,645.00	2.30	\$3,783.50
Telirio Saraiva (Sao Paulo)	Partner	Tax	2018	\$750.00	4.50	\$3,375.00
Thi Thanh Hoa Dao (Ho Chi Min)	Of Counsel	Tax	2010	\$520.00	2.00	\$1,040.00
<b>Partners and Counsel Totals</b>					<b>910.30</b>	<b>\$1,277,301.21</b>

NAME OF PROFESSIONAL	POSITION	DEPARTMENT	YEAR ADMITTED	HOURLY BILLING RATE	TOTAL HOURS BILLED	TOTAL COMPENSATION
Ana Marcos (FL)	Associate	Corporate & Securities	2021	\$795.00	11.10	\$8,824.50
Annasofia Roig (FL)	Associate	Litigation/Arbitration & Dispute Resolution	2019	\$895.00	13.40	\$11,993.00
Camila Siqueira (São Paulo)	Associate	Tax	2022	\$370.00	9.50	\$3,515.00
Dionna Shear (NY)	Associate	Employment & Compensation	2015	\$1,060.00	20.30	\$21,518.00
Estefania Lalinde (FL)	Associate	Corporate & Securities	2022	\$750.00	.80	\$600.00
Eugenia Vazquez (Madrid)	Associate	Corporate	2013	\$504.84 <sup>1</sup>	9.50	\$4,796.01
Grace Blackburn (NY)	Associate	Private Equity	2019	\$850.00	72.50	\$61,625.00
Gustavo Freitas (São Paulo)	Associate	Mergers, Acquisitions, Corporate Finance	2022	\$335.00	8.20	\$2,747.00
Hein Blaauwendraad (Amsterdam)	Associate	Corporate Reorganizations	2022	\$338.96 <sup>1</sup>	1.20	\$406.75
James Gilmore (DC)	Associate	Litigation/Arbitration & Dispute Resolution	2021	\$825.00	10.10	\$8,332.50
Jeroen Posthumus (Amsterdam)	Associate	Corporate Reorganizations	2022	\$337.75 <sup>1</sup>	1.30	\$439.08

NAME OF PROFESSIONAL	POSITION	DEPARTMENT	YEAR ADMITTED	HOURLY BILLING RATE	TOTAL HOURS BILLED	TOTAL COMPENSATION
Jonathan Susko (NY)	Associate	Corporate & Securities	2016	\$1,125.00	36.30	\$40,837.50
Joseph Chung (TX)	Associate	Tax	2023	\$750.00	.50	\$375.00
Karen Santamaria (Bogota)	Associate	Commercial Contracts, Real Estate	2011	\$620.00	3.70	\$2,294.00
Mariana Conrado (São Paulo)	Associate	Litigation/Arbitration & Dispute Resolution	2013	\$545.00	11.80	\$6,431.00
Michael Matthiesen (FL)	Associate	Litigation/Arbitration & Dispute Resoltn	2023	\$670.00	20.60	\$13,802.00
Phuoc Anh Tram Nguyen (Ho Chi Minh City)	Associate	Banking & Finance	2023	\$280.00	109.80	\$30,744.00
Reginald Sainvil (FL)	Associate	Restructuring & Insolvency	2015	\$1,195.00	534.40	\$638,608.00
Rocio Gonzalez (Madrid)	Associate	Litigation/Arbitration & Dispute Resolution	2005	\$552.20 <sup>1</sup>	.50	\$276.10
Tuan Minh Le (Ho Chi Minh City)	Associate	Litigation/Arbitration & Dispute Resolution	2016	\$350.00	1.00	\$350.00
Thijs Bogaers (Amsterdam)	Associate	Corporate Reorganizations	2016	\$613.69 <sup>1</sup>	38.40	\$23,565.85
Sanny Doan (Ho Chi Minh City)	Associate	Employment & Compensation	2023	\$300.00	.70	\$210.00

NAME OF PROFESSIONAL	POSITION	DEPARTMENT	YEAR ADMITTED	HOURLY BILLING RATE	TOTAL HOURS BILLED	TOTAL COMPENSATION
Thais Barboza (São Paulo)	Associate	Labor, Employment, & Employee Benefits	n/a	\$335.00	18.90	\$6,331.50
Thi Phuong Thao Nguyen (Hanoi)	Associate	Employment & Compensation	n/a	\$230.00	3.60	\$828.00
Trung Nguyen Nguyen (Ho Chi Minh City)	Associate	Transactional	2023	\$200.00	5.30	\$1,060.00
Zachary Bassen (NY)	Associate	Corporate & Securities	2023	\$750.00	105.20	\$78,900.00
Associate Total					1,048.60	\$969,409.79

The paraprofessionals who rendered professional services in these chapter 11 cases during the Second Interim Period are:

NAME OF PROFESSIONAL	DEPARTMENT	HOURLY BILLING RATE	TOTAL HOURS BILLED	TOTAL COMPENSATION
Zachary Bethel (NY) [Summer Associate]	General	\$485.00	3.00	\$1,455.00
Thi Bich Hanh Phan (Hanoi) [Law Clerk]	Mergers, Acquisitions, Corporate Finance	\$140.00	.50	\$70.00
Annika Thorelli (NY) [Paralegal]	Corporate & Securities	\$470.00	6.10	\$2,867.00
Cecilia Reategui (FL) [Paralegal]	Tax	\$455.00	11.50	\$5,232.50
Lori Seavey (FL) [Paralegal]	Restructuring & Insolvency	\$465.00	102.20	\$47,523.00
Maribel R. Fontanez (FL) [Paralegal]	Restructuring & Insolvency	\$465.00	212.70	\$98,905.50
Merredith Fong-Akan [Paralegal] [Amsterdam]	Corporate Reorganizations	\$295.65 <sup>1</sup>	14.10	\$4,168.59
<b>Paraprofessional Total</b>			350.10	\$160,221.59

The total fees for the Second Interim Period are: \$2,406,932.59

**Exhibit C**

**Summary of Hours by Professionals / Paraprofessionals  
[Final Period]**

The attorneys who rendered professional services in these chapter 11 cases during the Compensation Period are:

NAME OF PROFESSIONAL	POSITION	DEPARTMENT	YEAR ADMITTED	HOURLY BILLING RATE	TOTAL HOURS BILLED	TOTAL COMPENSATION
Adam Aft (IL)	Partner	Intellectual Property & Technology Law	2015	\$1,225.00	1.10	\$1,347.50
Adriana Stamato (São Paulo)	Partner	Tax	2000	\$750.00	1.00	\$750.00
Alexandre Lamy (DC)	Partner	International Commercial	2009	\$1,260.00	2.00	\$2,520.00
Benjamin Davis (FL)	Partner	Litigation/Arbitration & Dispute Resolution	2014	\$1,195.00	36.00	\$43,020.00
Blaire Cahn (NY)	Partner	Restructuring & Insolvency	2009	\$1,345.00	243.30	\$327,238.50
Brian Burke (DC)	Partner	Litigation/Arbitration & Dispute Resolution	1998	\$1,395.00	5.60	\$7,812.00
Cecilia Pastor (Madrid)	Partner	Trade & Commerce	1989	\$678.35 <sup>1</sup>	1.50	\$1,017.52
Christopher Guldberg (IL)	Partner	Employment & Compensation	1992	\$1,235.00	1.30	\$1,605.50
Clare Montgomery (Bogota)	Partner	Commercial Contracts, Real Estate	1994	\$740.00	.60	\$444.00
Cyrus Vance (NY)	Partner	Litigation/Arbitration & Dispute Resolution	1983	\$1,735.00	2.50	\$4,337.50

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<sup>1</sup> Average Estimated Rate in USD



NAME OF PROFESSIONAL	POSITION	DEPARTMENT	YEAR ADMITTED	HOURLY BILLING RATE	TOTAL HOURS BILLED	TOTAL COMPENSATION
Federico Cuadra Del Carmen (FL)	Partner	Corporate & Securities	2014	\$1,345.00	697.40	\$938,003.00
Fedor Tanke (Amsterdam)	Of Counsel	Banking & Finance	1996	\$731.24 <sup>1</sup>	9.70	\$7,093.00
Gledson Marques de Campos (Sao Paulo)	Partner	Litigation/Arbitration & Dispute Resolution	2000	\$850.00	194.10	\$164,985.00
Henrik Stipdonk (Amsterdam)	Of Counsel	Tax	2009	\$874.24 <sup>1</sup>	1.90	\$1,661.06
Hoang Anh Nguyen (Ho Chi Minh City)	Of Counsel	Employment & Compensation	2023	\$480.00	54.00	\$25,920.00
Jacob Kaplan (NY)	Partner	Litigation/Arbitration & Dispute Resolution	2003	\$1,295.00	16.40	\$21,238.00
John R. Dodd (FL)	Partner	Restructuring & Insolvency	2007	\$1,345.00	504.20	\$678,149.00
John R. Dodd (FL)	Partner	Restructuring & Insolvency	2007	\$672.50 <sup>2</sup>	65.30	\$43,914.25
Kai Kramer (TX)	Partner	Tax	2005	\$1,545.00	9.50	\$14,677.50
Kerry Contini (DC)	Partner	International Commercial	2006	\$1,350.00	.90	\$1,215.00

<sup>2</sup> Rate reduced by 50% for non-working travel time.

<b>NAME OF PROFESSIONAL</b>	<b>POSITION</b>	<b>DEPARTMENT</b>	<b>YEAR ADMITTED</b>	<b>HOURLY BILLING RATE</b>	<b>TOTAL HOURS BILLED</b>	<b>TOTAL COMPENSATION</b>
Kevin Whittam (NY)	Partner	Banking & Finance	2015	\$1,345.00	178.70	\$240,351.50
Kim Tan (Amsterdam)	Partner	Corporate Reorganizations	1999 <sup>3</sup>	\$827.55 <sup>1</sup>	2.00	\$1,655.10
Marc Florent (London)	Partner	Litigation/Arbitration & Dispute Resolution	1992	\$1,252.80 <sup>1</sup>	3.30	\$4,134.24
Mark Bloom (FL)	Partner	Restructuring & Insolvency	1980	\$1,645.00	277.00	\$455,665.00
Matthew Dening (London)	Partner	Banking & Finance – Structured Capital Market	1995	\$1,391.61	4.10	\$5,705.61
Matthew Smith (NY)	Of Counsel	Banking & Finance	2012	\$1,295.00	195.40	\$253,043.00
Oanh Nguyen (Ho Chi Minh City)	Partner	Banking & Finance	1999	\$950.00	53.80	\$51,110.00
Paul J. Keenan Jr. (FL)	Partner	Restructuring & Insolvency	2002	\$1,645.00	759.10	\$1,248,719.50
Paul J. Keenan Jr. (FL)	Partner	Restructuring & Insolvency	2002	\$822.50 <sup>2</sup>	70.50	\$57,986.25
Ronald Ohren (IL)	Of Counsel	Litigation/Arbitration & Dispute Resolution	1986	\$1,270.00	1.60	\$2,032.00
Ross Staine (TX)	Partner	Tax	2014	\$1,295.00	12.30	\$15,928.50

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<sup>3</sup> Civil Law Notary

NAME OF PROFESSIONAL	POSITION	DEPARTMENT	YEAR ADMITTED	HOURLY BILLING RATE	TOTAL HOURS BILLED	TOTAL COMPENSATION
Silvia Bernardino (Sao Paulo)	Partner	Mergers, Acquisitions, Corporate Finance	2008	\$685.00	22.30	\$15,275.50
Steven Canner (NY)	Partner	Corporate & Securities	1991	\$1,645.00	31.00	\$50,995.00
Telirio Saraiva (Sao Paulo)	Partner	Tax	2018	\$750.00	4.50	\$3,375.00
Thanh Vinh Nguyen (Ho Chi Min)	Partner	Tax	2007	\$800.00	3.80	\$3,040.00
Thi Thanh Hoa Dao (Ho Chi Min)	Of Counsel	Tax	2010	\$520.00	7.50	\$3,900.00
Wibren Veldhuizen (Amsterdam)	Partner	Tax	2003	\$1,032.91 <sup>1</sup>	1.60	\$1,652.65
William Devaney (NY)	Partner	Litigation/Arbitration & Dispute Resolution	1992	\$1,505.00	2.60	\$3,913.00
William Roppolo (FL)	Partner	Litigation/Arbitration & Dispute Resolution	1999	\$1,430.00	11.80	\$16,874.00
<b>Partners and Counsel Totals</b>					<b>3,491.20</b>	<b>\$4,722,304.18</b>

NAME OF PROFESSIONAL	POSITION	DEPARTMENT	YEAR ADMITTED	HOURLY BILLING RATE	TOTAL HOURS BILLED	TOTAL COMPENSATION
Alysha Preston (NY)	Associate	Intellectual Property & Technology Law	2017	\$1,095.00	2.00	\$2,190.00
Ana Marcos (FL)	Associate	Corporate & Securities	2021	\$795.00	62.30	\$49,528.50
Annasofia Roig (FL)	Associate	Litigation/Arbitration & Dispute Resolution	2019	\$895.00	13.40	\$11,993.00
Bruno Cesar Tavares da Silva (São Paulo)	Associate	Mergers, Acquisitions, Corporate Finance	2020	\$375.00	4.10	\$1,537.50
Camila Siqueira (São Paulo)	Associate	Tax	2022	\$370.00	9.50	\$3,515.00
Chehak Gogia (NY)	Associate	Litigation/Arbitration & Dispute Resolution	2023	\$670.00	14.40	\$9,648.00
Courtney Giles (TX)	Associate	Litigation/Arbitration & Dispute Resolution	2015	\$1,115.00	118.40	\$132,016.00
Daniel Kelderhuis (Amsterdam)	Associate	Banking & Finance	2021	\$469.74 <sup>1</sup>	2.80	\$1,315.26
Darley Maw (NY)	Associate	Litigation/Arbitration & Dispute Resolution	2017	\$1,130.00	5.30	\$5,989.00
Dionna Shear (NY)	Associate	Employment & Compensation	2015	\$1,060.00	20.30	\$21,518.00
Eleanor Dive (London)	Associate	Litigation/Arbitration & Dispute Resolution	n/a	\$378.66 <sup>1</sup>	5.80	\$2,196.20

NAME OF PROFESSIONAL	POSITION	DEPARTMENT	YEAR ADMITTED	HOURLY BILLING RATE	TOTAL HOURS BILLED	TOTAL COMPENSATION
Estefania Lalinde (FL)	Associate	Corporate & Securities	2022	\$750.00	1.30	\$975.00
Eugenia Vazquez (Madrid)	Associate	Corporate	2013	\$508.79 <sup>1</sup>	22.00	\$11,193.47
Grace Blackburn (NY)	Associate	Private Equity	2019	\$850.00	311.90	\$265,115.00
Gregorio Ruggeri-Laderchi (Amsterdam)	Associate	Litigation/Arbitration & Dispute Resolution	2020	\$474.98 <sup>1</sup>	1.60	\$759.97
Gustavo Freitas (São Paulo)	Associate	Mergers, Acquisitions, Corporate Finance	2022	\$335.00	21.80	\$7,303.00
Heidi Smucker (DC)	Associate	Litigation/Arbitration & Dispute Resoltn	2020	\$825.00	14.70	\$12,127.50
Hein Blaauwendraad (Amsterdam)	Associate	Corporate Reorganizations	2022	\$338.96 <sup>1</sup>	1.20	\$406.75
Isabelle Bronzwaer (Amsterdam)	Associate	Tax	2015	\$652.98 <sup>1</sup>	1.10	\$718.28
Ilse Bosman (Amsterdam)	Associate	Tax	2017	\$617.70 <sup>1</sup>	10.60	\$6,547.58
James Gilmore (DC)	Associate	Litigation/Arbitration & Dispute Resolution	2021	\$825.00	10.10	\$8,332.50
Javier Pera (Madrid)	Associate	Labor, Employment & Employee Benefits	2008	\$556.97 <sup>1</sup>	9.10	\$5,068.38

NAME OF PROFESSIONAL	POSITION	DEPARTMENT	YEAR ADMITTED	HOURLY BILLING RATE	TOTAL HOURS BILLED	TOTAL COMPENSATION
Jeffrey Butler (IL)	Associate	Litigation/Arbitration & Dispute Resolution	2022	\$670.00	10.50	\$7,035.00
Jeroen Posthumus (Amsterdam)	Associate	Corporate Reorganizations	2022	\$341.38 <sup>1</sup>	3.40	\$1,160.70
Jonathan Susko (NY)	Associate	Corporate & Securities	2016	\$1,125.00	65.40	\$73,575.00
Joseph Chung (TX)	Associate	Tax	2023	\$750.00	14.20	\$10,650.00
Kalli McCoy (TX)	Associate	Litigation/Arbitration & Dispute Resolution	2021	\$760.00	80.50	\$61,180.00
Karen Santamaria (Bogota)	Associate	Commercial Contracts, Real Estate	2011	\$620.00	3.70	\$2,294.00
Laura van Kleef (Amsterdam)	Associate	Tax	2023	\$388.55 <sup>1</sup>	3.20	\$1,243.36
Maria Delso (Madrid)	Associate	Tax	2017	\$478.26 <sup>1</sup>	.70	\$334.78
Mariana Conrado (São Paulo)	Associate	Litigation/Arbitration & Dispute Resolution	2013	\$545.00	69.00	\$37,605.00
Megan Ruigrok (Amsterdam)	Associate	Tax	2014	\$774.53 <sup>1</sup>	1.80	\$1,394.16
Michael Matthiesen (FL)	Associate	Litigation/Arbitration & Dispute Resoltn	2023	\$670.00	38.60	\$25,862.00

NAME OF PROFESSIONAL	POSITION	DEPARTMENT	YEAR ADMITTED	HOURLY BILLING RATE	TOTAL HOURS BILLED	TOTAL COMPENSATION
Phuoc Anh Tram Nguyen (Ho Chi Minh City)	Associate	Banking & Finance	2023	\$280.00	235.40	\$65,912.00
Ralph Potgieter (Amsterdam)	Associate	Tax	2019	\$550.90 <sup>1</sup>	3.70	\$2,038.33
Reginald Sainvil (FL)	Associate	Restructuring & Insolvency	2015	\$1,195.00	972.50	\$1,162,137.50
Reginald Sainvil (FL)	Associate	Restructuring & Insolvency	2015	\$597.50	5.00	\$2,987.50
Rocio Gonzalez (Madrid)	Associate	Litigation/Arbitration & Dispute Resolution	2005	\$555.57 <sup>1</sup>	.90	\$500.01
Rylie Hayes (TX)	Associate	Litigation/Arbitration & Dispute Resoltn	2023	\$670.00	5.10	\$3,417.00
Sanny Doan (Ho Chi Minh City)	Associate	Employment & Compensation	2023	\$300.00	.70	\$210.00
Santiago Teran (Madrid)	Associate	Commercial	2008	\$562.34 <sup>1</sup>	8.90	\$5,003.94
Thais Barboza (São Paulo)	Associate	Labor, Employment, & Employee Benefits	n/a	\$335.00	33.60	\$11,256.00
Thijs Bogaers (Amsterdam)	Associate	Corporate Reorganizations	2016	\$615.75 <sup>1</sup>	78.10	\$48,090.03
Thi Phuong Thao Nguyen (Hanoi)	Associate	Employment & Compensation	n/a	\$230.00	12.20	\$2,806.00

<b>NAME OF PROFESSIONAL</b>	<b>POSITION</b>	<b>DEPARTMENT</b>	<b>YEAR ADMITTED</b>	<b>HOURLY BILLING RATE</b>	<b>TOTAL HOURS BILLED</b>	<b>TOTAL COMPENSATION</b>
Thi Thu Van Tran (Vietnam)	Associate	Tax	2019	\$310.00	1.80	\$558.00
Trung Nguyen Nguyen (Ho Chi Minh City)	Associate	Transactional	2023	\$200.00	12.60	\$2,520.00
Tuan Minh Le (Ho Chi Minh City)	Associate	Litigation/Arbitration & Dispute Resolution	2016	\$350.00	6.40	\$2,240.00
Zachary Bassen (NY)	Associate	Corporate & Securities	2023	\$750.00	187.70	\$140,775.00
<b>Associate Total</b>					<b>2,519.30</b>	<b>\$2,232,779.20</b>



The paraprofessionals who rendered professional services in these chapter 11 cases during the Second Interim Period are:

NAME OF PROFESSIONAL	DEPARTMENT	HOURLY BILLING RATE	TOTAL HOURS BILLED	TOTAL COMPENSATION
Zachary Bethel (NY) [Summer Associate]	General	\$485.00	3.00	\$1,455.00
Ha An Ngoc Le (Hanoi) [Law Clerk]	Employment & Compensation	\$170.00	1.10	\$187.00
Samantha Osaki (Sao Paulo) [Law Clerk]	Litigation/Arbitration & Dispute Resolution	\$130.00	3.00	\$390.00
Thi Bich Hanh Phan (Hanoi) [Law Clerk]	Mergers, Acquisitions, Corporate Finance	\$140.00	.90	\$126.00
Terry Allen (NY) [Law Clerk]	Corporate & Securities	\$750.00	4.30	\$3,225.00
Thuy Duong Vu (Vietnam) [Trainee]	Litigation/Arbitration & Dispute Resolution	\$140.00	.50	\$70.00
David Cederquist (CA) [Manager, Global eDiscovery & Data Advisory, Americas]	General	\$475.00	.70	\$332.50
Ben Flint (DC) [Senior Support Analyst]	Litigation/Arbitration & Dispute Resolution	\$400.00	5.90	\$2,360.00
Valerie Spears (DC) [Analyst]	General	\$400.00	2.60	\$1,040.00
Annika Thorelli (NY) [Paralegal]	Corporate & Securities	\$470.00	6.10	\$2,867.00

NAME OF PROFESSIONAL	DEPARTMENT	HOURLY BILLING RATE	TOTAL HOURS BILLED	TOTAL COMPENSATION
Cecilia Reategui (FL) [Paralegal]	Tax	\$455.00	12.90	\$5,869.50
Lori Seavey (FL) [Paralegal]	Restructuring & Insolvency	\$465.00	450.50	\$209,482.50
Maria Machado (São Paulo) [Paralegal]	Mergers, Acquisitions, Corporate Finance	\$195.00	4.70	\$916.50
Maribel R. Fontanez (FL) [Paralegal]	Restructuring & Insolvency	\$465.00	435.90	\$202,693.50
Merredith Fong-Akan [Paralegal] [Amsterdam]	Corporate Reorganizations	\$295.65 <sup>1</sup>	14.10	\$4,168.59
Ryan Orange (DC) [Paralegal]	International Commercial	\$465.00	.20	\$93.00
<b>Paraprofessional Total</b>			946.40	\$435,276.09

The total fees for the Second Interim Period are: \$7,390,359.47

**Exhibit D**

**Summary of Hours by Matters / Categories  
[Second Interim Period]**

<b>TASK CODE</b>	<b>PROJECT CATEGORY</b>	<b>TOTAL HOURS BILLED</b>	<b>AMOUNT</b>
<b>B100</b>	Administration / General Corporate Administration	153.00	\$204,201.00
<b>B110</b>	Case Administration	175.10	\$166,824.00
<b>B120</b>	Asset Analysis Recovery	17.20	\$19,349.50
<b>B130</b>	Asset Disposition	547.50	\$432,512.76
<b>B140</b>	Relief From Stay /Adequate Protection	13.40	\$15,340.00
<b>B150</b>	Meetings and Communications w/Creditors	3.20	\$4,910.00
<b>B160</b>	Fee/Employment Applications	104.50	\$54,542.50
<b>B170</b>	Fee/Employment Objections	1.50	\$697.50
<b>B185</b>	Assumption/Rejection of Leases and Contracts	6.60	\$5,624.85
<b>B190</b>	Other Contested Matters	116.00	\$107,489.87
<b>B195</b>	Non-Working Travel (Billed at 50% Rate)	23.50	\$18,293.75
<b>B210</b>	Business Operations	11.10	\$12,361.50
<b>B220</b>	Employee Benefits / Pensions	4.40	\$1,200.00
<b>B230</b>	Financing / Cash Collections	31.40	\$42,669.00

<b>B240</b>	Tax Issues	16.80	\$9,233.50
<b>B260</b>	Board of Directors Matters	8.10	\$4,037.12
<b>B310</b>	Claims Administration and Objections	11.00	\$13,208.00
<b>B320</b>	Plan & Disclosure Statement	995.40	\$1,245,740.50
<b>B400</b>	Bankruptcy Related Advise	5.30	\$2,681.65
<b>B410</b>	General Bankruptcy Advice/Opinions	64.00	\$46,015.59
<b>Total:</b>		<b>2,309.00</b>	<b>\$2,406,932.59</b>

**Exhibit D**

**Summary of Hours by Matters / Categories  
[Final Period]**

<b>TASK CODE</b>	<b>PROJECT CATEGORY</b>	<b>TOTAL HOURS BILLED</b>	<b>AMOUNT</b>
<b>B100</b>	Administration	491.50	\$644,036.89
<b>B110</b>	Case Administration	1,164.40	\$1,154,102.00
<b>B120</b>	Asset Analysis Recovery	57.90	\$63,454.28
<b>B130</b>	Asset Disposition	1,455.70	\$1,365,663.18
<b>B140</b>	Relief From Stay /Adequate Protection	19.30	\$24,895.50
<b>B150</b>	Meetings and Communications w/Creditors	52.20	\$73,110.00
<b>B160</b>	Fee/Employment Applications	471.90	\$389,166.00
<b>B170</b>	Fee/Employment Objections	1.50	\$697.50
<b>B185</b>	Assumption/Rejection of Leases and Contracts	15.20	\$12,538.85
<b>B190</b>	Other Contested Matters	752.30	\$734,508.38
<b>B195</b>	Non-Working Travel (Billed at 50% Rate)	140.80	\$104,888.00
<b>B210</b>	Business Operations	387.70	\$498,293.50
<b>B220</b>	Employee Benefits / Pensions	54.70	\$44,517.50
<b>B230</b>	Financing / Cash Collections	482.40	\$657,427.00

<b>B240</b>	Tax Issues	60.20	\$48,348.81
<b>B260</b>	Board of Directors Matters	10.40	\$5,283.84
<b>B300</b>	Claims and Plan	23.10	\$37,173.50
<b>B310</b>	Claims Administration and Objections	37.30	\$40,588.50
<b>B320</b>	Plan & Disclosure Statement	1,075.20	\$1,346,660.50
<b>B400</b>	Bankruptcy Related Advise	23.60	\$16,493.15
<b>B410</b>	General Bankruptcy Advice/Opinions	150.50	\$111,477.01
<b>B420</b>	Restructurings	29.10	\$17,035.58
<b>Total:</b>		<b>6,956.90</b>	<b>\$7,390,359.47</b>



**Exhibit E**

**Detailed Narratives  
[Time Records for Second Interim Period]**



**Matter Number:** 51171831  
**Invoice Number:** 9656067936  
**Invoice Due Date:** Payable in 30 days

June 07, 2024

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RE: Chapter 11 Cases

**Time Details**

**B100-Administration**

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/01/2024	Federico Cuadra Del Carmen	(2.7) Tend to correspondence from Project Mocha, drafting updates and responses as required; (0.5) Call with Mercon Management, Riveron and Baker Teams to discuss deal updates and open action items.	3.20	1,345.00	4,304.00
04/02/2024	Federico Cuadra Del Carmen	(2.4) Tend to correspondence from Project Mocha, drafting updates and responses as required.	2.40	1,345.00	3,228.00
04/03/2024	Federico Cuadra Del Carmen	(2.6) Tend to correspondence from Project Mocha, drafting updates and responses as required; (0.5) Call with Mercon Management, Riveron and Baker Teams to discuss deal updates and open action items;	3.40	1,345.00	4,573.00
04/04/2024	Federico Cuadra Del Carmen	(0.3) Final hearing on cash collateral order. (2.6) Tend to correspondence from Project Mocha, drafting updates and responses as required; (0.5) Call with FMO to discuss progress	3.10	1,345.00	4,169.50
04/05/2024	Federico Cuadra Del Carmen	Ch. 11 case. (2.7) Tend to correspondence from Project Mocha, drafting updates and responses as required;	3.50	1,345.00	4,707.50



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/06/2024	Federico Cuadra Del Carmen	(0.5) Call with Mercon Management, Riveron and Baker Teams to discuss deal updates and open action items; (0.3) Call with Rabo and Senior Lenders. (1.3) Tend to correspondence from Project Mocha, drafting updates and responses as required.	1.30	1,345.00	1,748.50
04/07/2024	Federico Cuadra Del Carmen	(1.1) Tend to correspondence from Project Mocha, drafting updates and responses as required.	1.10	1,345.00	1,479.50
04/08/2024	Federico Cuadra Del Carmen	(2.7) Tend to correspondence from Project Mocha, drafting updates and responses as required; (0.5) Call with Mercon Management, Riveron and Baker Teams to discuss deal updates and open action items.	3.20	1,345.00	4,304.00
04/09/2024	Federico Cuadra Del Carmen	(2.8) Tend to correspondence from Project Mocha, drafting updates and responses as required.	2.80	1,345.00	3,766.00
04/09/2024	Silvia Bernardino	Review of three purchase and sale of coffe agreement to check the steps required to assign the agreement (0.4), coordination of the comments requested by F.Cuadra (0.2) with G.Freitas and email to F.Cuandra do provide the comments (0.2). Review of the addition	1.10	685.00	753.50



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		clarifications requested by F.Cuadra and prepared by G. Freitas (0.3).			
04/10/2024	Federico Cuadra Del Carmen	Tend to correspondence from Project Mocha, drafting updates and responses as required.	2.90	1,345.00	3,900.50
04/11/2024	Federico Cuadra Del Carmen	(2.6) Tend to correspondence from Project Mocha, drafting updates and responses as required.	2.60	1,345.00	3,497.00
04/12/2024	Federico Cuadra Del Carmen	(2.8) Tend to correspondence from Project Mocha, drafting updates and responses as required;	3.30	1,345.00	4,438.50
		(0.5) Call with Mercon Management, Riveron and Baker Teams to discuss deal updates and open action items.			
04/13/2024	Federico Cuadra Del Carmen	Tend to correspondence from Project Mocha, drafting updates and responses as required.	1.30	1,345.00	1,748.50
04/14/2024	Federico Cuadra Del Carmen	Tend to correspondence from Project Mocha, drafting updates and responses as required.	1.00	1,345.00	1,345.00
04/15/2024	Federico Cuadra Del Carmen	(2.8) Tend to correspondence from Project Mocha, drafting updates and responses as required;	3.30	1,345.00	4,438.50
		(0.5) Call with Mercon Management, Riveron and Baker Teams to discuss deal updates and open action items.			
04/15/2024	Silvia Bernardino	Review of the email of	0.60	685.00	411.00



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		J.Susko with the template of the assignment agreements and request of review and tax comments (0.3). Coordination with the team to review the documents and prepare the clarifications requested (0.3).			
04/16/2024	Federico Cuadra Del Carmen	(2.6) Tend to correspondence from Project Mocha, drafting updates and responses as required; (0.2) Mercon Omnibus Court Hearing.	2.80	1,345.00	3,766.00
04/17/2024	Federico Cuadra Del Carmen	(2.7) Tend to correspondence from Project Mocha, drafting updates and responses as required; (0.5) Call with P. Keenan to discuss updates on sale process and Ch. 11 process.	3.20	1,345.00	4,304.00
04/18/2024	Federico Cuadra Del Carmen	Tend to correspondence from Project Mocha, drafting updates and responses as required.	2.80	1,345.00	3,766.00
04/19/2024	Federico Cuadra Del Carmen	(1.1) Tend to correspondence from Project Mocha, drafting updates and responses as required; (0.5) Call with Mercon Management, Riveron and Baker Teams to discuss deal updates and open action items.	1.60	1,345.00	2,152.00



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June 07, 2024

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/20/2024	Federico Cuadra Del Carmen	Tend to correspondence from Project Mocha, drafting updates and responses as required.	2.30	1,345.00	3,093.50
04/21/2024	Federico Cuadra Del Carmen	Tend to correspondence from Project Mocha, drafting updates and responses as required.	0.30	1,345.00	403.50
04/22/2024	Federico Cuadra Del Carmen	(2.9) Tend to correspondence from Project Mocha, drafting updates and responses as required; (0.7) Call with Mercon Management, Riveron and Baker Teams to discuss deal updates and open action items; (0.3) Call with P. Keenan to discuss updates from Liquidation Plan work stream.	3.90	1,345.00	5,245.50
04/23/2024	Federico Cuadra Del Carmen	(2.9) Tend to correspondence from Project Mocha, drafting updates and responses as required; (0.5) Call with shareholders to discuss transaction updates.	3.40	1,345.00	4,573.00
04/24/2024	Federico Cuadra Del Carmen	(2.7) Tend to correspondence from Project Mocha, drafting updates and responses as required; (0.6) Call with Mercon Management, Riveron and Baker Teams to discuss deal updates and open action items.	3.30	1,345.00	4,438.50
04/25/2024	Federico Cuadra Del Carmen	(2.8) Tend to correspondence from	3.20	1,345.00	4,304.00



**Matter Number:** 51171831  
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June 07, 2024

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/26/2024	Federico Cuadra Del Carmen	Project Mocha, drafting updates and responses as required; (0.4) Call with Rabo and Senior Lenders. (2.5) Tend to correspondence from Project Mocha, drafting updates and responses as required; (0.7) Call with Mercon Management, Riveron and Baker Teams to discuss deal updates and open action items.	3.20	1,345.00	4,304.00
04/29/2024	Federico Cuadra Del Carmen	(2.5) Tend to correspondence from Project Mocha, drafting updates and responses as required; (0.7) Call with Mercon Management, Riveron and Baker Teams to discuss deal updates and open action items.	3.20	1,345.00	4,304.00
04/30/2024	Federico Cuadra Del Carmen	(2.3) Tend to correspondence from Project Mocha, drafting updates and responses as required; (2.2) Call with O. Sevilla, J. Ibarra, S. Stemmler, K. Hoogenboezem, H. Light and P. Keenan to discuss questions from the Observer from the Dutch WHOA proceeding.	4.50	1,345.00	6,052.50

**B110-Case Administration**

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/01/2024	Ana Marcos	Draft Notice of Extension.	0.40	795.00	318.00
04/01/2024	Lori Seavey	Review recent filings	0.40	465.00	186.00



**Matter Number:** 51171831  
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**Invoice Due Date:** Payable in 30 days

June 07, 2024

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		and update WIP/ calendar and circulate to Baker team (.4)			
04/01/2024	Maribel Fontanez	Review WIP and Calendar; update calendar accordingly.	0.20	465.00	93.00
04/01/2024	Mark Bloom	Followup with RESOR and Brazil team on revised draft New Protocol and related Motion for Chapter 11 cases (due 2 April), and arrangements for filing to ensure 16 April hearing calendar.	0.60	1,645.00	987.00
04/01/2024	Paul Keenan	Conference with CRO and senior management team.	0.50	1,645.00	822.50
04/01/2024	Reginald Sainvil	Analyze work in progress list and outline next steps.	0.70	1,195.00	836.50
04/01/2024	Reginald Sainvil	Correspondence regarding ordinary course professional retention.	0.50	1,195.00	597.50
04/01/2024	Reginald Sainvil	Correspondence regarding quarterly reporting requirements.	0.40	1,195.00	478.00
04/01/2024	Reginald Sainvil	Review and revise notices and hearing agenda.	0.60	1,195.00	717.00
04/01/2024	Reginald Sainvil	Analyze and revise supplement to ordinary course list.	0.40	1,195.00	478.00
04/02/2024	Maribel Fontanez	Register J. Dodd, F. Cuadra del Carmen and M. Marambio Calvo for telephonic appearance at 04.03.2024 hearing.	0.30	465.00	139.50
04/02/2024	Mark Bloom	Final review of & revision of updated draft New Protocol	1.40	1,645.00	2,303.00





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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/02/2024	Paul Keenan	and related Motion (.8), and multiple emails and telephone conferences with Krijn re submission in US and Netherlands (.6). Preparation for questions at hearing regarding cash collateral and other issues.	0.70	1,645.00	1,151.50
04/02/2024	Reginald Sainvil	Analyze revised protocol for court to court communications.	0.60	1,195.00	717.00
04/02/2024	Reginald Sainvil	Analyze settlement procedures for certain claims.	0.50	1,195.00	597.50
04/02/2024	Reginald Sainvil	Review final order regarding assumption and assignment of unexpired leases.	0.20	1,195.00	239.00
04/02/2024	Reginald Sainvil	Correspondence regarding payroll services.	0.30	1,195.00	358.50
04/03/2024	Ana Marcos	Attend call with opposing counsel to discuss extension.	0.40	795.00	318.00
04/03/2024	Maribel Fontanez	Register M. Bloom, P. Keenan and R. Sainvil for 04.16.2024 hearing.	0.20	465.00	93.00
04/03/2024	Paul Keenan	Conference with R. Sainvil regarding proposed orders.	0.30	1,645.00	493.50
04/03/2024	Paul Keenan	Preparation for hearing.	0.80	1,645.00	1,316.00
04/03/2024	Paul Keenan	Periodic meeting with CRO and management team.	1.00	1,645.00	1,645.00
04/03/2024	Reginald Sainvil	Analyze further revised protocol and related correspondence.	0.40	1,195.00	478.00
04/03/2024	Reginald Sainvil	Prepare for and attend	1.00	1,195.00	1,195.00



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		hearing on final cash collateral order.			
04/03/2024	Reginald Sainvil	Draft and revise status update.	0.70	1,195.00	836.50
04/03/2024	Reginald Sainvil	Analyze issues regarding legal closure of the Representative Offices in Vietnam.	0.50	1,195.00	597.50
04/04/2024	Paul Keenan	Conference with counsel for FMO.	0.60	1,645.00	987.00
04/05/2024	Cecilia Reategui	Internal communication with G. Blackburn on remote notarization of Director certificate.	0.40	455.00	182.00
04/05/2024	Maribel Fontanez	Review WIP and Calendar and docket; communicate with R. Sainvil regarding pending deadlines.	0.40	465.00	186.00
04/05/2024	Mark Bloom	Review of Dutch Court Order approving New Protocol, and planning for submission to US court for reference at 16 April hearing.	0.30	1,645.00	493.50
04/05/2024	Paul Keenan	Numerous correspondence with Rabo and others regarding timing of plan process.	0.80	1,645.00	1,316.00
04/05/2024	Paul Keenan	Numerous correspondence regarding resolution of tax audit in Guatemala.	0.40	1,645.00	658.00
04/05/2024	Paul Keenan	Conference with senior management team and CRO; and follow up with CRO.	0.80	1,645.00	1,316.00
04/08/2024	Ana Marcos	Draft Disclosure Statement and review relevant documentation.	3.00	795.00	2,385.00



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04/08/2024	Lori Seavey	Review recent filings and update WIP/ calendar and circulate to Baker team (1.1); review new orders entered and update case calendar (.9); telephone call with R. Sainvil regarding same (.1).	2.10	465.00	976.50
04/08/2024	Maribel Fontanez	Communicate with R. Sainvil regarding pending matters.	0.30	465.00	139.50
04/08/2024	Mark Bloom	Exchange of emails with Krijn and RESOR/Riveron teams regarding tasks, workstreams and timeline, and related preparation for (.7) & attendance on weekly telephone conference with RESOR & Riveron (1.0).	1.70	1,645.00	2,796.50
04/08/2024	Paul Keenan	Analysis of updated list of deadlines in case and correspondence regarding same.	0.20	1,645.00	329.00
04/08/2024	Paul Keenan	Correspondence and analysis regarding preparation of MORs.	0.30	1,645.00	493.50
04/09/2024	Ana Marcos	Attend call with R. Sainvil (Associate Miami) to discuss transcripts and Disclosure Statement.	0.30	795.00	238.50
04/09/2024	Ana Marcos	Continue to draft Disclosure Statement.	2.00	795.00	1,590.00
04/09/2024	Ana Marcos	Review court transcripts.	1.50	795.00	1,192.50
04/09/2024	Maribel Fontanez	Review WIP and Calendar; update calendar; communicate with L.	0.40	465.00	186.00



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		Seavey regarding same.			
04/09/2024	Maribel Fontanez	Redact MORs.	4.10	465.00	1,906.50
04/10/2024	Lori Seavey	Review recent filings and update WIP and case calendar re same (.5); emails with R. Sainvil regarding preparation for April 16 hearings and filings related to same (.2).	0.70	465.00	325.50
04/10/2024	Mariana Conrado	Exchange emails with Harve Light to verify his availability to schedule a meeting with Santander.	0.40	545.00	218.00
		Exchange emails with Paul Kennan to address the questions sent by Mercon Brazil on the continuance of the operation.			
04/10/2024	Maribel Fontanez	Compile and finalize MORs; file same and process for service.	2.40	465.00	1,116.00
04/10/2024	Mark Bloom	Review of open items in Observer checklist of questions, and related preparation for (.6) & participation in weekly telephone conference with Observer (.8).	1.40	1,645.00	2,303.00
04/10/2024	Paul Keenan	Conference with senior management team and CRO and follow up regarding same.	0.50	1,645.00	822.50
04/10/2024	Reginald Sainvil	Analyze monthly operating reports.	0.50	1,195.00	597.50
04/11/2024	Cecilia Reategui	Conduct notarization of Director's Certificate of Mercafe Vietnam Ltd and Agro	1.50	455.00	682.50



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04/11/2024	Lori Seavey	International Holding B.V.; communicate with client's office on shipping instructions; internal communication with G. Blackburn on same. Draft agenda for 4/16 hearing (.3). Update WIP/Calendar regarding MORs filed (.4); emails with R. Sainvil re same (.1); update agenda for 4/16 hearing and circulate to R. Sainvil, M. Bloom and P. Keenan (.3).	1.10	465.00	511.50
04/12/2024	Ana Marcos	Draft Disclosure Statement.	2.50	795.00	1,987.50
04/12/2024	Cecilia Reategui	Respond to query raised in connection with attestation of passport copy.	0.50	455.00	227.50
04/12/2024	Lori Seavey	Emails with R. Sainvil regarding agenda (.1); review court docket re: filings related to matters scheduled to be heard (.1); review agenda for 4/16 hearing and prepare for filing (.2); circulate as filed copies on Baker team and Kroll (.1).	0.50	465.00	232.50
04/12/2024	Mark Bloom	Planning for April 16 hearing on New Protocol Motion.	0.20	1,645.00	329.00
04/12/2024	Paul Keenan	Conference with CRO and senior management team and follow up regarding same.	0.70	1,645.00	1,151.50
04/12/2024	Paul Keenan	Analysis of agenda for	0.40	1,645.00	658.00



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04/15/2024	Lori Seavey	next hearing and preparation for same. Review UST notice of continued 341 meeting (.1); circulate order entered on Modified Protocol (.1); Revise agenda for 4/16 hearing to reflect resolved item (.2); attend to e-filing amended agenda for 4/16 hearing (.2).	0.60	465.00	279.00
04/15/2024	Lori Seavey	Review new filings and case communications re: updates to case calendar and WIP (.7); circulate to Baker team (.1). Review UST continuance of 341 meeting and update calendar re same (.1).	0.90	465.00	418.50
04/15/2024	Mark Bloom	Planning for and advice to RSainvil on 16 April hearing on MApprove New Protocol (.3); review of JWiles Order approving New Protocol, and series of emails with RESOR and Baker teams regarding same (.3); Brazil ancillary proceeding -- planning for enforcement of Plan and related actions required to transfer assets to Liquidating Trust and wind up/dissolve Brazil company, incl. Telephone conference	1.10	1,645.00	1,809.50



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04/15/2024	Paul Keenan	with Trench Rossi and LCoelho general manager (.5). Conference with senior management team and CRO and follow up regarding same.	0.60	1,645.00	987.00
04/15/2024	Reginald Sainvil	Prepare for omnibus hearing.	0.80	1,195.00	956.00
04/16/2024	Lori Seavey	Review latest filings and calculate and calendar critical deadlines re: same (.5).	0.50	465.00	232.50
04/16/2024	Maribel Fontanez	Review updated WIP/ Calendar; update calendar accordingly.	0.50	465.00	232.50
04/16/2024	Paul Keenan	Attendance at hearing and conference with CRO after same.	0.60	1,645.00	987.00
04/16/2024	Reginald Sainvil	Analysis of forward contract issues.	0.80	1,195.00	956.00
04/16/2024	Reginald Sainvil	Prepare for and attend omnibus hearing.	0.70	1,195.00	836.50
04/17/2024	Ana Marcos	Attend call with G. Blackburn (Associate NY) to discuss revisions to Assignment and Assumption Agreement (0.6); review and revise Assignment and Assumption Agreement (0.4).	1.00	795.00	795.00
04/17/2024	Reginald Sainvil	Analyze and revise 2015.3 report.	0.50	1,195.00	597.50
04/18/2024	Federico Cuadra Del Carmen	Analyze questions from Mercon on the dissolution of Mercon Colombia.	0.30	1,345.00	403.50
04/18/2024	Lori Seavey	Review affidavit of service for completeness; review	0.20	465.00	93.00



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		latest appearances and update case database re same (.2).			
04/18/2024	Maribel Fontanez	Review 2015.3 report; communicate with R. Sainvil regarding same.	0.50	465.00	232.50
04/18/2024	Mark Bloom	Exchange of multiple emails with Brazil team, HLight and Chipman firm regarding impact of recent ruling from Brazil court and enforcement of Chapter 11 relief and rulings in Brazil ancillary proceeding (.9), and planning of strategy and for telephone conferences with bank counsel re same (.3).	1.20	1,645.00	1,974.00
04/18/2024	Paul Keenan	Multiple conferences with CRO.	0.50	1,645.00	822.50
04/18/2024	Reginald Sainvil	Analyze issues regarding potential bank account closures.	0.70	1,195.00	836.50
04/19/2024	Reginald Sainvil	Review updated schedules and statements.	0.60	1,195.00	717.00
04/22/2024	Lori Seavey	Review new filings and case communications re: updates to case calendar and WIP (.5); circulate to Baker team (.1).	0.60	465.00	279.00
04/22/2024	Maribel Fontanez	Review and calendar updated WIP/Calendar.	0.20	465.00	93.00
04/22/2024	Paul Keenan	Conference with senior management team and CRO.	0.70	1,645.00	1,151.50
04/22/2024	Paul Keenan	Analysis of upcoming	0.20	1,645.00	329.00





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04/24/2024	Mark Bloom	calendar and deadlines. Followup with RESOR & Riveron on outstanding Observer questions.	0.20	1,645.00	329.00
04/24/2024	Paul Keenan	Conference with senior management team and CRO.	0.50	1,645.00	822.50
04/25/2024	Mariana Conrado	Conference with GCampas to discuss the pending measures on the case, considering the last developments of the case on USA.	0.40	545.00	218.00
04/25/2024	Paul Keenan	Correspondence and analysis regarding letter from BoA regarding Mercon BV bank accounts.	0.30	1,645.00	493.50
04/26/2024	Mariana Conrado	Conference with GCampas to discuss the draft of the answer to be sent to FCuadra to address his questions on the execution of the Barter Contract.	0.30	545.00	163.50
04/26/2024	Paul Keenan	Conference with CRO and senior management team and follow up.	1.00	1,645.00	1,645.00
04/26/2024	Paul Keenan	Correspondence with Resor regarding disclosure statement and plan process.	0.30	1,645.00	493.50
04/27/2024	Paul Keenan	Conference with R. Sainvil.	0.30	1,645.00	493.50
04/28/2024	Mariana Conrado	Exchange emails with LSeavey to address the problem involving the document received from the US Dept. of State and to confirm	0.20	545.00	109.00

**Baker  
McKenzie.**

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		the full version of the document to be translated.			
04/29/2024	Lori Seavey	Review case filings and update case calendar and WIP (.5); circulate to Baker team (.1).	0.60	465.00	279.00
04/29/2024	Mariana Conrado	Exchange emails with Baker's team to address the questions sent by Santander regarding its credit appointed on the creditors' list in USA and to inform it on the deadline to file a possible appeal in the recognition lawsuit in Brazil.	0.70	545.00	381.50
04/29/2024	Mark Bloom	Exchange of multiple emails with MConrado regarding appeal period for Brazil clarification order on scope of stay, and prospects for success on appeal (.2), bank question on trade balance and inclusion in Chapter 11 cases (.6).	0.80	1,645.00	1,316.00
04/29/2024	Paul Keenan	Conference with CRO and senior management team.	0.50	1,645.00	822.50
04/29/2024	Paul Keenan	Conference with R. Sainvil regarding filing of disclosure statement motion.	0.30	1,645.00	493.50
04/30/2024	Mark Bloom	Followup w/GCampos on Brazil coordination issues.	0.20	1,645.00	329.00
04/30/2024	Paul Keenan	Conference with management team regarding events	0.50	1,645.00	822.50



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		leading up to chapter 11.			
<b>B120-Asset Analysis and Recovery</b>					
<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/01/2024	Oanh Nguyen	Review Zach's email of 30 March regarding termination agreement; discuss with Tram and finalize the revisions.	0.40	950.00	380.00
04/08/2024	Oanh Nguyen	Review and update the merger filing docs and application dossier to change the legal rep of Vietnam entities; discuss with Tram to finalize it.	1.20	950.00	1,140.00
04/09/2024	Paul Keenan	Conference with potential insurance coverage counsel and analysis of various policies.	1.30	1,645.00	2,138.50
04/11/2024	Oanh Nguyen	Review and revise Tram's draft response regarding timeline for registering the 2nd legal rep and Biju's resignation; review the application dossier on changing the legal rep.	1.20	950.00	1,140.00
04/11/2024	Paul Keenan	Conference with insurance coverage attorney and follow up regarding D&O insurance coverage analysis.	0.60	1,645.00	987.00
04/11/2024	Ronald Ohren	Telephone call with P. Keenan (BM Miami) re the status of the bankruptcy, focusing on the Liquidating Trust and Liquidating Trustee's likely right to investigate and	0.50	1,270.00	635.00



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		prosecute any and all claims that may be covered under Mercon's D&O insurance policies and to pursue recoveries under those policies, and, relatedly, whether this would require or should result in any sort of update to D&O insurers in connection with the prior notice of circumstances to those insurers.			
04/15/2024	Paul Keenan	Conference with insurance coverage attorneys regarding potential claims, and follow up analysis regarding same.	0.30	1,645.00	493.50
04/17/2024	Oanh Nguyen	Discuss with Tram regarding appointment of legal rep of Vietnam subsidiaries and the buyer's correspondence.	0.40	950.00	380.00
04/18/2024	Oanh Nguyen	Review Sucafina's email regarding merger filing and change of legal rep of Vietnam subsidiaries; review and finalize Tram's draft response.	0.50	950.00	475.00
04/19/2024	Oanh Nguyen	Discuss with Tram regarding a call with KPMG and Sucafina regarding Payment Date, merger filing and change of directors, etc. ; review and finalize Tram's draft response/advice.	1.20	950.00	1,140.00
04/22/2024	Oanh Nguyen	Review Tram's draft response regarding	0.80	950.00	760.00



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		change of board directors of VN subsidiaries and how it affects the short form SPA, merger filing, etc.; finalize the response.			
04/23/2024	Oanh Nguyen	Discuss with Tram and finalize her draft response regarding Sucafina's proposal on merger filing and signing, payment date, etc.	0.70	950.00	665.00
04/24/2024	Oanh Nguyen	Correspond and respond regarding signing authority of the target and merger filing documents.	0.40	950.00	380.00

**B130-Asset Disposition**

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/01/2024	Federico Cuadra Del Carmen	(0.4) Tend to Hacofco NDA; (0.6) Tend to US APA Disclosure Schedules.	1.00	1,345.00	1,345.00
04/01/2024	Grace Blackburn	Call to review closing checklist and follow-up actions with respect to the same; review and mark-up documents for antitrust approval and discuss the same with the client; review NDA for sale of additional assets.	3.20	850.00	2,720.00
04/01/2024	Jonathan Susko	Correspondence with P. Keenan regarding sale order; correspondence with F. Cuadra Del Carmen regarding the APA; prepare and send emails to Riveron and	2.40	1,125.00	2,700.00



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		Mercon regarding schedules to the APA and the seller disclosure schedules; prepare for and participate in call with F. Cuadra Del Carmen, C. Russell and J. Zehnder regarding disclosure schedules; prepare and send email to Z. Bassen regarding the disclosure schedules and updates to the same; correspondence with Riveron and Rothschild regarding escrow agreement; correspondence regarding revised disclosure schedules; prepare and send email to Z. Bassen regarding the APA schedules and updates to the same.			
04/01/2024	Kai Kramer	Review StoneX comments to APA; email correspondence with BM tax team re: same.	0.30	1,545.00	463.50
04/01/2024	Paul Keenan	Multiple correspondence regarding open issues in Vietnam sale including sale order.	0.40	1,645.00	658.00
04/01/2024	Phuoc Anh Tram Nguyen	Review and clean up the Termination Agreement relating to the Pacorini Agreement.	0.30	280.00	84.00
04/01/2024	Reginald Sainvil	Analyze issues list related to Specialty Sale.	0.40	1,195.00	478.00



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04/01/2024	Reginald Sainvil	Analyze ancillary agreements regarding Vietnam sale and closing checklist.	0.60	1,195.00	717.00
04/01/2024	Reginald Sainvil	Analyze and address concerns regarding releases required to implement Vietnam sale.	0.80	1,195.00	956.00
04/01/2024	Reginald Sainvil	Analyze and revise declaration in support of Vietnam sale motion.	0.40	1,195.00	478.00
04/01/2024	Reginald Sainvil	Analyze revised asset purchase agreement in connection with Specialty Sale.	1.50	1,195.00	1,792.50
04/01/2024	Zachary Bassen	Review and revise draft disclosure schedules for StoneX transaction (0.5).	0.50	750.00	375.00
04/01/2024	Zachary Bassen	Closing checklist call with C. Prado, G. Blackburn and F. Cuadra del Carmen (0.6); revise closing checklist and draft closing documents (0.6).	1.20	750.00	900.00
04/02/2024	Federico Cuadra Del Carmen	(0.8) Analyze updated US APA provided by J. Susko;(0.2) Analyze updated US APA schedules provided by J. Susko.	1.00	1,345.00	1,345.00
04/02/2024	Grace Blackburn	Updating closing checklist and progressing deliverables.	0.60	850.00	510.00
04/02/2024	Jonathan Susko	Correspondence with Z. Bassen regarding schedules to the APA, including available contracts and purchased contracts,	2.30	1,125.00	2,587.50



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		and other miscellaneous items needed for signing; correspondence with StoneX regarding escrow agreement; correspondence with F. Cuadra Del Carmen regarding the draft APA; call with Z. Bassen and R. Sainvil regarding the schedules to the APA, including the available contracts and purchased contracts; call with F. Cuadra Del Carmen regarding revisions to the APA; revise APA to incorporate comments from F. Cuadra Del Carmen; prepare and send email to H. Light and Rothschild regarding revised APA.			
04/02/2024	Paul Keenan	Numerous correspondence and analysis regarding sale of Vietnam business.	0.40	1,645.00	658.00
04/02/2024	Paul Keenan	Numerous correspondence and analysis regarding specialty coffee sale and releases of guaranty claims.	0.70	1,645.00	1,151.50
04/02/2024	Reginald Sainvil	Analyze sale closing checklist.	0.20	1,195.00	239.00
04/02/2024	Reginald Sainvil	Strategy conference with Baker team regarding sale issues.	0.50	1,195.00	597.50
04/02/2024	Reginald Sainvil	Analyze subordination agreement and related release issues.	0.80	1,195.00	956.00





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04/02/2024	Reginald Sainvil	Analyze APA schedules regarding Specialty sale.	1.60	1,195.00	1,912.00
04/02/2024	Zachary Bassen	Vietnam Sale - Finalize and execute escrow agreement (0.7).	0.70	750.00	525.00
04/02/2024	Zachary Bassen	US Sale - review and revise APA Schedules (1.9); draft signing and closing checklist (1.5); draft board resolution of seller approving transaction (0.6); coordinate KYC requirements for escrow agreement (0.2).	4.20	750.00	3,150.00
04/03/2024	Estefania Lalinde	Prepare markup of authorizing resolutions to incorporate recitals with respect to the Chapter 11 case; prepare emails to R. Sainvil and Z. Bassen regarding same.	0.80	750.00	600.00
04/03/2024	Grace Blackburn	Liaise with local counsel on closing matters; updating closing checklist and progressing deliverables; reviewing comments on antitrust filings and retention agreement.	1.00	850.00	850.00
04/03/2024	Jonathan Susko	Review, analyze and revise seller authorizing resolution from Z. Bassen; correspondence and call with Z. Bassen regarding the same; correspondence with F. Cuadra Del Carmen regarding the seller	3.90	1,125.00	4,387.50



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		disclosure schedules; review analyze and revise schedules to the APA; correspondence with Z. Bassen regarding the same; review and analyze escrow agreement; correspondence with Riveron regarding escrow agreement; correspondence with C. Pereira and C. Russell regarding the disclosure schedules; correspondence and call with M. Smith regarding the contract consent process; correspondence with J. Pablo Ibarra regarding expiring insurance policies; correspondence with Z. Bassen and Citi regarding KYC; correspondence with Z. Bassen regarding the disclosure schedules and revisions to the same.			
04/03/2024	Maribel Fontanez	Review Judge Wiles procedures regarding hearing date on sale motion; communicate with R. Sainvil regarding same.	0.10	465.00	46.50
04/03/2024	Paul Keenan	Numerous correspondence regarding terms of and revisions to Vietnam sale documents.	0.40	1,645.00	658.00
04/03/2024	Phuoc Anh Tram Nguyen	Prepare the amended charters for the Vietnam entities	1.60	280.00	448.00



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		recording the appointment of the second legal representative nominated by the buyer.			
04/03/2024	Phuoc Anh Tram Nguyen	Review and revise the confirmation letter of Military Bank.	0.40	280.00	112.00
04/03/2024	Reginald Sainvil	Analyze and revise board consent.	0.50	1,195.00	597.50
04/03/2024	Reginald Sainvil	Analyze schedules regarding cure costs and related correspondence in connection with specialty business.	0.30	1,195.00	358.50
04/03/2024	Reginald Sainvil	Analyze open issues related to sale and related correspondence.	2.80	1,195.00	3,346.00
04/03/2024	Reginald Sainvil	Analyze deed of pledge and related correspondence.	0.70	1,195.00	836.50
04/03/2024	Zachary Bassen	Vietnam sale - Review closing documentation and coordinate closing items.	0.60	750.00	450.00
04/03/2024	Zachary Bassen	US sale - review and revise disclosure schedules, APA schedules and transaction consent.	1.20	750.00	900.00
04/04/2024	Grace Blackburn	Review BVI closing documents and amend the same; review Vietnamese antitrust filing and amend the same; update closing checklist; progress closing deliverables.	3.60	850.00	3,060.00
04/04/2024	Hoang Anh Nguyen	Review comments from Director of Vietnam entities on Retention Agreement,	3.10	480.00	1,488.00



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04/04/2024	Jonathan Susko	continue working on draft mutual separation agreements, respond to questions on release granted to employee, calculation of statutory benefits and de facto employment claims. Review and analyze revised authorizing resolutions from Z. Bassen; prepare and send email to Z. Bassen regarding comments to revised authorizing resolutions; correspondence with M. Smith and F. Cuadra Del Carmen regarding no conflicts schedule; correspondence with C. Russell regarding the independent contractor schedule; review and analyze revised APA schedules from Z. Bassen; correspondence with Z. Bassen regarding the same; correspondence with Z. Bassen regarding the company plan schedules and the revised APA.	0.80	1,125.00	900.00
04/04/2024	Paul Keenan	Multiple correspondence regarding releases and filing of Vietnam sale motion.	0.40	1,645.00	658.00



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04/04/2024	Phuoc Anh Tram Nguyen	Respond to questions from Blackburn, Grace regarding the unaudited financial statements of Agro International Holding B.V. and Mercafe Vietnam Ltd. for merger filing purpose.	0.40	280.00	112.00
04/04/2024	Phuoc Anh Tram Nguyen	Review questions from Claudia Prado Suarez (Mercon) on merger filing (0.4); prepare response to the same (1); confirm the outstanding points with KPMG (0.8).	2.20	280.00	616.00
04/04/2024	Reginald Sainvil	Analyze and address issues related to efforts to expedite sale of specialty business assets.	0.20	1,195.00	239.00
04/04/2024	Steven Canner	Attention to inventory sale and emails with Federico regarding same.	0.20	1,645.00	329.00
04/04/2024	Zachary Bassen	Review closing documents and revise closing checklist.	0.80	750.00	600.00
04/04/2024	Zachary Bassen	Review and revise APA, APA schedules and disclosure schedules.	1.50	750.00	1,125.00
04/05/2024	Federico Cuadra Del Carmen	(0.3) Tend to VN Closing deliverables; (0.3) Call with L. Chamorro, J. Ibarra and H. Light to discuss VN Antitrust filing; (0.3) Call with G. Blackburn and Z. Bassen to review VN Closing Checklist.	0.90	1,345.00	1,210.50
04/05/2024	Grace Blackburn	Review and mark-up Retention and Mutual	3.40	850.00	2,890.00



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04/05/2024	Hoang Anh Nguyen	Separation Agreement; liaise with local counsel on closing deliverables; checklist call. Finalize draft of both Retention Agreement and Mutual Separation Agreement with Director of Vietnam entities, including response to his comments and proposed revisions to the Retention Agreement and a Vietnamese version for the Mutual Separation Agreement.	3.60	480.00	1,728.00
04/05/2024	Jonathan Susko	Prepare for and participate in call with Z. Bassen regarding the seller disclosure schedules; review and analyze revised seller disclosure schedules from Z. Bassen; correspondence with F. Cuadra Del Carmen regarding revised seller disclosure schedules; review and analyze signing and closing checklist from Z. Bassen and APA; revise signing and closing checklist.	3.20	1,125.00	3,600.00
04/05/2024	Phuoc Anh Tram Nguyen	Discuss and confirm with Bui Thu Thuy (Mercafe Vietnam) on the outstanding balance at the Military Bank.	0.10	280.00	28.00



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04/05/2024	Phuoc Anh Tram Nguyen	Update the charter of the Vietnamese entities.	0.50	280.00	140.00
04/05/2024	Phuoc Anh Tram Nguyen	Update the Vietnamese language version of the merger filing dossier.	1.20	280.00	336.00
04/05/2024	Reginald Sainvil	Analyze notice procedures for sale of specialty business and review list of purchased contracts.	0.80	1,195.00	956.00
04/05/2024	Zachary Bassen	Vietnam Sale - Call with G. Blackburn and F. Cuadra Del Carmen to discuss status of various closing items.	0.70	750.00	525.00
04/05/2024	Zachary Bassen	Review and revise disclosure schedules for distribution to opposing counsel.	0.80	750.00	600.00
04/07/2024	Zachary Bassen	Vietnam sale - attend to closing matters including reviewing assignment and assumption agreement and coordinating legal rep changes with Vietnam.	0.30	750.00	225.00
04/08/2024	Grace Blackburn	Review antitrust filing documents and provide comments on the same; progress closing deliverables.	3.20	850.00	2,720.00
04/08/2024	Hoang Anh Nguyen	Review updates to Retention Agreement and Mutual Separation Agreement, update the Vietnamese version and comment on signing date and effective date.	1.20	480.00	576.00
04/08/2024	Jonathan Susko	Correspondence with H. Light and StoneX's counsel regarding title	0.50	1,125.00	562.50



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		to Purchased Assets; correspondence with P. Keenan regarding bankruptcy notices required in connection with the transaction; correspondence with F. Cuadra Del Carmen, M. Smith and Z. Bassen regarding contract transfer to StoneX in Brazil.			
04/08/2024	Maribel Fontanez	Review sale related documents for finalizing.	1.10	465.00	511.50
04/08/2024	Paul Keenan	Correspondence and analysis regarding questions from StoneX counsel on structure acquisition.	0.50	1,645.00	822.50
04/08/2024	Paul Keenan	Correspondence and analysis regarding revisions to StoneX APA.	0.30	1,645.00	493.50
04/08/2024	Phuoc Anh Tram Nguyen	Revise the dossier for registering the second legal representative of the Vietnam entities.	1.00	280.00	280.00
04/08/2024	Phuoc Anh Tram Nguyen	Discuss with Bui Thu Thuy (Mercafe Vietnam) on the review of the Marker Report.	0.20	280.00	56.00
04/08/2024	Phuoc Anh Tram Nguyen	Review and revise the Market Report prepared by KPMG.	1.90	280.00	532.00
04/08/2024	Phuoc Anh Tram Nguyen	Update address information of Mercafe Vietnam Ltd in the merger filing dossier.	0.30	280.00	84.00
04/08/2024	Reginald Sainvil	Analyze issues regarding sale of Specialty assets.	0.50	1,195.00	597.50





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04/08/2024	Steven Canner	Attention to inventory contracts.	0.30	1,645.00	493.50
04/08/2024	Tuan Minh Le	Work with Nguyen Anh Tram to prepare response to follow-up questions regarding merger filing dossier and request for information.	0.30	350.00	105.00
04/08/2024	Zachary Bassen	Vietnam sale - Review assignment agreement and assignment and assumption agreement; attend to other closing matters.	0.80	750.00	600.00
04/08/2024	Zachary Bassen	US Sale - Review and revise signing and closing checklist.	0.40	750.00	300.00
04/09/2024	Federico Cuadra Del Carmen	(0.3) Draft email to J. Adams presenting required certificates for VN antitrust filing.	0.30	1,345.00	403.50
04/09/2024	Grace Blackburn	Review and revise draft of Retention Agreement and Severance Agreement; revise Officer's Notarial Certificate; proof-read antitrust Market Report and review client's comments on the same.	4.30	850.00	3,655.00
04/09/2024	Jonathan Susko	Review and analyze revised drafts of the seller disclosure schedules and the schedules to the APA from StoneX; review and analyze proposed revisions to the same from Z. Bassen; correspondence with Z. Bassen regarding comments to the same;	1.70	1,125.00	1,912.50



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		correspondence with local counsel in Brazil and F. Cuadra Del Carmen regarding sale of certain contracts to StoneX and required documentation with respect to the same.			
04/09/2024	Maribel Fontanez	Finalize and e-file motion to approve sale and related documents; communicate with R. Sainvil regarding same.	2.00	465.00	930.00
04/09/2024	Paul Keenan	Correspondence and analysis regarding revised terms of StoneX APA.	0.30	1,645.00	493.50
04/09/2024	Phuoc Anh Tram Nguyen	Work on question from Cuadra Del Carmen, Federico regarding the wording for certification of the financial statements.	0.30	280.00	84.00
04/09/2024	Reginald Sainvil	Analyze market assessment and transaction description regarding Vietnam sale.	0.90	1,195.00	1,075.50
04/09/2024	Reginald Sainvil	Analyze proposed assignment agreements related to Vietnam sale.	0.30	1,195.00	358.50
04/09/2024	Steven Canner	Attention to Brazil issues.	0.30	1,645.00	493.50
04/09/2024	Zachary Bassen	USA sale - Review and revise disclosure schedules and APA schedules.	1.20	750.00	900.00
04/09/2024	Zachary Bassen	Vietnam sale - review and revise documentation for change in legal rep at closing.	0.50	750.00	375.00



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04/10/2024	Grace Blackburn	Review and revise draft of Retention Agreement and Severance Agreement; revise Officer's Notarial Certificate; proof-read antitrust Market Report and review client's comments on the same.	2.30	850.00	1,955.00
04/10/2024	Hoang Anh Nguyen	Update Retention Agreement to clarify employee's entitlement to salary and benefits until termination date.	0.60	480.00	288.00
04/10/2024	Jonathan Susko	Correspondence with Z. Bassen regarding disclosure schedules revisions, escrow agreement and signing checklist; prepare for and participate in call with H. Walsh, StoneX and Mercon Brazil regarding the barter contracts and the related sale; correspondence with A. Morley and A. Terr regarding the schedules and APA; correspondence with P. Keenan and Z. Bassen regarding signing process and deliverables.	1.70	1,125.00	1,912.50
04/10/2024	Maribel Fontanez	Research objection deadline for sale motion; prepare, finalize and e-file notice of hearing and amended notice of hearing of same; communicate with R.	2.30	465.00	1,069.50



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04/10/2024	Paul Keenan	Sainvil regarding same; register P. Keenan and R. Sainvil to appear at 05.08.2024 hearing telephonically. Numerous correspondence and analysis regarding request of guaranty claims in support of Vietnam sale.	0.40	1,645.00	658.00
04/10/2024	Paul Keenan	Close analysis of sale motion for Vietnam business and exhibits to same.	0.50	1,645.00	822.50
04/10/2024	Paul Keenan	Numerous correspondence regarding revisions to terms of StoneX sale.	0.40	1,645.00	658.00
04/10/2024	Phuoc Anh Tram Nguyen	Update the merger filing dossier and share the same with KPMG.	0.70	280.00	196.00
04/10/2024	Reginald Sainvil	Analyze disclosures regarding specialty sale and authorizations.	0.60	1,195.00	717.00
04/10/2024	Reginald Sainvil	Correspondence regarding sale motion and hearing related thereto.	0.40	1,195.00	478.00
04/10/2024	Zachary Bassen	Review and revise disclosure schedules; prepare signature pages.	0.90	750.00	675.00
04/10/2024	Zachary Bassen	Vietnam sale - review documentation for legal rep changes in Vietnam; review and revise closing checklist.	1.30	750.00	975.00
04/11/2024	Federico Cuadra Del Carmen	(1)Call with B. Nair, C. Pereira and G. Blackburn to discuss	1.70	1,345.00	2,286.50



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		questions from B. Nair on separation agreement; (0.4) Call with L. Chamorro to discuss questions on VN antitrust filings; (0.3) Tend to parent guarantee questions on US APA.			
04/11/2024	Grace Blackburn	Call with Biju to discuss Retention Agreement; progress antitrust filing and change in legal rep; re-draft Retention Agreement.	3.70	850.00	3,145.00
04/11/2024	Jonathan Susko	Correspondence with P. Keenan and R. Sainvil regarding the revised APA, sale order and transaction sequencing; review and analyze correspondence with StoneX regarding parent guarantee; correspondence with S. Canner and F. Cuadra Del Carmen regarding parent guarantee; prepare for and participate in call with S. Canner regarding parent guarantee; review, analyze and revise parent guarantee from A. Terr; call with A. Terr regarding remaining items needed for signing; call with Z. Bassen regarding revised schedules to the APA; review and analyze revised APA, escrow	3.30	1,125.00	3,712.50



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04/11/2024	Lori Seavey	agreement and seller disclosure schedules from StoneX; correspondence regarding the same with H. Light. Telephone call with R. Sainvil regarding notice of sale for service on all creditors (.1); draft notice and circulate draft (1.2); final edits to notice of sale and attend to e-filing (.3); email to Kroll regarding service on creditor matrix and additional individuals (.2).	1.80	465.00	837.00
04/11/2024	Paul Keenan	Numerous correspondence and analysis regarding sale to StoneX.	0.40	1,645.00	658.00
04/11/2024	Paul Keenan	Numerous correspondence regarding next steps for sale of Vietnam business.	0.40	1,645.00	658.00
04/11/2024	Phuoc Anh Tram Nguyen	Further consider the impact and procedure of replacing the legal representative of the Vietnamese entities and update the response on the same.	0.90	280.00	252.00
04/11/2024	Phuoc Anh Tram Nguyen	Prepare response to questions from Blackburn, Grace re legalized documents for registration of the new legal representative of the Vietnamese entities.	0.40	280.00	112.00
04/11/2024	Phuoc Anh Tram Nguyen	Review the questions from Blackburn,	1.80	280.00	504.00



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		Grace regarding replacement of the legal representative of the Vietnamese entities (0.3); clarify the same with Blackburn, Grace (0.2); discuss on the legal representative replacement procedure with Nguyen Trung Nguyen (0.2); prepare response to questions from Blackburn, Grace (1.1).			
04/11/2024	Phuoc Anh Tram Nguyen	Prepare response to question from Blackburn, Grace regarding confidentiality of the personal information in the merger filing procedure.	0.20	280.00	56.00
04/11/2024	Steven Canner	Calls with Susko regarding guarantee, attention to related emails.	0.40	1,645.00	658.00
04/11/2024	Zachary Bassen	US sale - review and finalize APA schedules, disclosure schedules and other signing documentation.	1.80	750.00	1,350.00
04/11/2024	Zachary Bassen	Vietnam sale - Draft and revise closing documentation.	0.40	750.00	300.00
04/12/2024	Federico Cuadra Del Carmen	Analyze updated Retention Agreement and Mutual Separation Agreement provided by H. Anh and G. Blackburn; Draft email to B. Nair presenting updated RA and MSA.	1.10	1,345.00	1,479.50



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04/12/2024	Grace Blackburn	Management call; reviewing Vietnamese documents and providing comments on the same; liaising for sign-off on Retention Agreement; progress change in legal rep documentation.	4.30	850.00	3,655.00
04/12/2024	Hoang Anh Nguyen	Review, update and translate relevant clauses in Retention Agreement and Mutual Separation Agreement, address employee's comments and queries, prepare cover email, prepare final clean version for signing, respond on signing protocol.	3.20	480.00	1,536.00
04/12/2024	Jonathan Susko	Attention to various signing matters; correspondence and calls with Z. Bassen, StoneX's counsel, F. Cuadra Del Carmen and H. Light re signing; review and analyze signing documentation from Z. Bassen; correspondence with Z. Bassen regarding comments to signing documentation; correspondence with H. Walsh and P. Keenan regarding the contracts transfer in Brazil.	1.80	1,125.00	2,025.00
04/12/2024	Kai Kramer	Review email correspondence re: assignment of	0.40	1,545.00	618.00





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04/12/2024	Paul Keenan	contracts; call with R. Staine re: same. Correspondence and analysis regarding disposition of Brazilian contracts.	0.30	1,645.00	493.50
04/12/2024	Phuoc Anh Tram Nguyen	Consider and respond to follow-up questions from Blackburn, Grace regarding replacement of legal representative of the Vietnamese entities.	0.90	280.00	252.00
04/12/2024	Phuoc Anh Tram Nguyen	Prepare response to questions from Blackburn, Grace regarding the legalized documents.	1.10	280.00	308.00
04/12/2024	Phuoc Anh Tram Nguyen	Prepare and exchange emails with KPMG on the dossier for registration of an additional legal representative of the Vietnamese entities and removal of the current legal representative.	1.00	280.00	280.00
04/12/2024	Phuoc Anh Tram Nguyen	Prepare and exchange emails with KPMG on the pending information and status of documents required for the merger filing and the next steps.	1.20	280.00	336.00
04/12/2024	Reginald Sainvil	Analyze proposed revisions to APA and revised list of potential leases to be rejected.	0.70	1,195.00	836.50
04/12/2024	Steven Canner	Attention to schedule emails.	0.20	1,645.00	329.00
04/12/2024	Zachary Bassen	Finalize and execute APA and escrow agreement; prepare	1.50	750.00	1,125.00



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04/12/2024	Zachary Bassen	signing set of compiled documents. Draft and revise closing documentation.	0.20	750.00	150.00
04/14/2024	Paul Keenan	Correspondence and analysis regarding draft sale order for StoneX transaction.	0.60	1,645.00	987.00
04/15/2024	Cecilia Reategui	Preparation of draft sworn affidavit of passport copy; internal communication on same.	0.60	455.00	273.00
04/15/2024	Federico Cuadra Del Carmen	Tend to questions on VN closing deliverables.	0.30	1,345.00	403.50
04/15/2024	Grace Blackburn	Facilitate legalizing of documents and progressing closing deliverables	1.30	850.00	1,105.00
04/15/2024	Jonathan Susko	Correspondence with P. Keenan and R. Sainvil regarding Brazil transfer and questions from H. Walsh regarding timing and sequencing with respect to the same; correspondence with R. Staine regarding the assignment and assumption agreement; prepare for and participate in call with R. Sainvil and Z. Bassen regarding the sale motion; review, analyze and revise the assignment and assumption agreement; prepare form consent; prepare and send email to local	2.60	1,125.00	2,925.00



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		counsel in Brazil regarding draft assignment and assumption agreement and consent; correspondence with F. Cuadra Del Carmen, P. Keenan and R. Sainvil regarding assignment and assumption agreement and the closing mechanics; call with P. Keenan regarding assignment and assumption agreement and transfer of contracts in Brazil; revise assignment and assumption agreement to reflect discussion with P. Keenan.			
04/15/2024	Phuoc Anh Tram Nguyen	Discuss and clarify with Bui Thu Thuy on the prepaid expenses and other Vietnamese closing deliverables (0.9); review the inventory insurance agreement and its amended terms and conditions (1); report the discussion result to BM US team (0.4).	2.30	280.00	644.00
04/15/2024	Phuoc Anh Tram Nguyen	Revise and finalize the market report per comments from Bui Thu Thuy (Mercafe Vietnam).	0.90	280.00	252.00
04/15/2024	Phuoc Anh Tram Nguyen	Review and update the merger filing dossier received from KPMG.	0.80	280.00	224.00
04/15/2024	Zachary Bassen	US sale - Prepare summary of APA terms for inclusion in	1.10	750.00	825.00



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04/16/2024	Cecilia Reategui	the sale motion; call with J. Susko and R. Sainvil to discuss chapter 11 process. Conduct in person notarization on Affidavit of L. Chamorro; communication on Apostille procedure.	0.50	455.00	227.50
04/16/2024	Federico Cuadra Del Carmen	Analyze questions on transaction mechanics for BRA assignment and assumption agreement.	0.40	1,345.00	538.00
04/16/2024	Grace Blackburn	Review antitrust filing and change in legal rep; correspondence with BM Vietnam and Sucafina.	1.30	850.00	1,105.00
04/16/2024	Jonathan Susko	Review and analyze transaction summary from Z. Bassen and relevant APA provision; revise transaction summary from Z. Bassen; correspondence with Z. Bassen regarding the same; correspondence with P. Keenan and F. Cuadra Del Carmen regarding split sign and close and anticipated timing; correspondence with local counsel in Brazil regarding the assignment and assumption agreement.	1.70	1,125.00	1,912.50
04/16/2024	Paul Keenan	Correspondence and analysis regarding assumptions and	0.30	1,645.00	493.50



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04/16/2024	Phuoc Anh Tram Nguyen	assignment agreement for StoneX. Review and work on comments from J. Dargan (Sucafina) on registration of the 2nd legal representative of the Vietnamese company.	1.20	280.00	336.00
04/16/2024	Phuoc Anh Tram Nguyen	Review follow up questions from J. Dargan (Sucafina) on registration of the 2nd legal representative and respond to the same.	1.40	280.00	392.00
04/16/2024	Reginald Sainvil	Analyze and determine legal mechanism to effectuate assignment of contracts in different jurisdictions.	1.80	1,195.00	2,151.00
04/16/2024	Zachary Bassen	Review and revise sale motion APA summary.	0.40	750.00	300.00
04/17/2024	Cecilia Reategui	Coordinate legalization of document for use in Vietnam.	0.60	455.00	273.00
04/17/2024	Federico Cuadra Del Carmen	Call with VN Purchaser to discuss questions on closing deliverables.	0.80	1,345.00	1,076.00
04/17/2024	Grace Blackburn	Call with BM VN to discuss corporate filings; review and facilitate antitrust filings.	2.90	850.00	2,465.00
04/17/2024	Jonathan Susko	Review, analyze and revise assignment and assumption agreement to reflect bifurcated sign and close structure; review and analyze	2.90	1,125.00	3,262.50



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		correspondence from local counsel in Brazil; prepare and send emails to local counsel in Brazil and Mercon regarding questions with respect to the proposed transfer; review, analyze and revise assignment and assumption agreement and contract consents to incorporate comments from local counsel in Brazil; call with F. Cuadra Del Carmen; prepare and send email to StoneX regarding draft documentation.			
04/17/2024	Maribel Fontanez	Update motion for sale, per R. Sainvil's instructions.	0.60	465.00	279.00
04/17/2024	Phuoc Anh Tram Nguyen	Review the Market Report updated by KPMG.	0.80	280.00	224.00
04/17/2024	Phuoc Anh Tram Nguyen	Work on additional questions from J. Dargan regarding registration of the 2nd legal representative (0.9); discuss the same with Blackburn, Grace (0.6).	1.50	280.00	420.00
04/17/2024	Phuoc Anh Tram Nguyen	Discuss with Blackburn, Grace on the steps for registration of the 2nd legal representative to respond to questions from J. Dargan (Sucafina).	0.60	280.00	168.00
04/17/2024	Phuoc Anh Tram Nguyen	Discuss with Bui Thu Thuy (Mercafe	0.20	280.00	56.00



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04/17/2024	Reginald Sainvil	Vietnam) on the requirements regarding preparation of the final Exhibit A. Preparation of outline for sale motion and related declarations in support of sale of specialty assets.	2.60	1,195.00	3,107.00
04/17/2024	Reginald Sainvil	Analyze revised assumption and assignment agreement in connection with specialty sale.	0.70	1,195.00	836.50
04/17/2024	Zachary Bassen	Review closing checklist and allocate tasks.	0.40	750.00	300.00
04/17/2024	Zachary Bassen	Review closing officers certificate.	0.10	750.00	75.00
04/18/2024	Federico Cuadra Del Carmen	Call with VN Purchaser to discuss questions on closing deliverables.	0.80	1,345.00	1,076.00
04/18/2024	Grace Blackburn	Call with KPMG and BM Vietnam and Sucafina to discuss antitrust filing, legal representative and directors; email correspondence progressing the same.	3.60	850.00	3,060.00
04/18/2024	Jonathan Susko	Correspondence with J. Pearson regarding the Brazilian contract transfer; correspondence with P. Keenan regarding Brazilian contract transfer and authorizing resolutions; prepare and send emails to local counsel in Brazil regarding the additional contract	0.60	1,125.00	675.00



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		transfer, further revisions to the assignment and assumption agreement and local authorizations necessary to enter into the assignment and assumption agreement; review and analyze revised assignment and assumption agreement from local counsel in Brazil; correspondence regarding the same.			
04/18/2024	Phuoc Anh Tram Nguyen	Review comments from J. Dargan (Sucafina) re registration of the legal representative and merger filing (0.7); prepare an email to clarify the same with J. Dargan (Sucafina) (0.5).	1.20	280.00	336.00
04/18/2024	Phuoc Anh Tram Nguyen	Review additional information regarding the replacement of the legal representative of the Vietnamese companies and discuss the same with Blackburn, Grace.	0.90	280.00	252.00
04/18/2024	Phuoc Anh Tram Nguyen	Prepare a summary of the steps and key points regarding the registration of the legal representative of the Vietnamese companies and the BVI director for Sucafina (0.9); update and finalize the same	1.40	280.00	392.00





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04/18/2024	Phuoc Anh Tram Nguyen	per comments from Blackburn, Grace for sending out (0.5). Update Cuadra Del Carmen, Federico on the merger filing dossier status.	0.30	280.00	84.00
04/19/2024	Federico Cuadra Del Carmen	Analyze timing considerations for updated BRA assignment and assumption agreement.	0.30	1,345.00	403.50
04/19/2024	Grace Blackburn	Review and revise antitrust and legal representative documents.	1.00	850.00	850.00
04/19/2024	Hoang Anh Nguyen	Prepare response on signatories of Retention Agreement and Mutual Separation Agreement.	0.20	480.00	96.00
04/19/2024	Jonathan Susko	Review and analyze comments from local tax counsel regarding the proposed transaction; correspondence with local tax counsel regarding revisions to the assignment and assumption agreement.	0.40	1,125.00	450.00
04/19/2024	Phuoc Anh Tram Nguyen	Discuss with Nguyen Trung Nguyen to update the dossier for registration of the legal representative (0.2); review and revise the dossier for registration of the legal representative of Mercafe Vietnam Company Ltd updated by Nguyen Trung Nguyen and signature pack of Mercon (1).	1.20	280.00	336.00



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04/19/2024	Phuoc Anh Tram Nguyen	Attend a call with Sucafina and KPMG regarding the Vietnam closing deliverables.	0.80	280.00	224.00
04/19/2024	Phuoc Anh Tram Nguyen	Discuss with KPMG on the registration of legal representative of the Vietnamese company and merger filing (0.8); consider and discuss with Blackburn, Grace on proposal from KPMG (0.5); prepare a summary of proposal from KPMG (1.2); clarify further with KPMG on their proposal (0.8); discuss with Oanh Nguyen on proposal from KPMG (0.2); update the summary on KPMG's proposal per clarification from KPMG and comment on such proposal (1.3); update the comments on the proposal per comments from Oanh Nguyen (0.7).	5.50	280.00	1,540.00
04/19/2024	Phuoc Anh Tram Nguyen	Discuss with Bui Thu Thuy (Mercafe Vietnam) on the confirmation letter from the Military Bank and other Vietnam closing deliverables.	0.40	280.00	112.00
04/19/2024	Phuoc Anh Tram Nguyen	Discuss and clarify with KPMG on their new alternative proposal re closing of the main Stock Purchase Agreement.	0.40	280.00	112.00



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04/19/2024	Phuoc Anh Tram Nguyen	Work with Nguyen Hoang Anh on the signing requirement of the Retention Agreement and Mutual Termination Agreement.	0.30	280.00	84.00
04/19/2024	Phuoc Anh Tram Nguyen	Review and revise the list of pending information and documents for the dossier of legal representative registration.	0.40	280.00	112.00
04/19/2024	Reginald Sainvil	Analyze and assess loss of value concerns and timing considerations for specialty asset sale.	0.80	1,195.00	956.00
04/19/2024	Reginald Sainvil	Analyze forward contract notice and related issues.	0.90	1,195.00	1,075.50
04/19/2024	Silvia Bernardino	Review of the purchase sale agreement with the rights and obligations of the broker and email to JSusko to provide the clarifications requested by him regarding this (0.4). Review of the tax comment and email to JSusko to provide them related to the assignment agreements (0.4). Review of the corporate documents and powers of attorney, email to J. Susko to provide comments regarding the representation of	1.20	685.00	822.00



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04/20/2024	Federico Cuadra Del Carmen	the Brazilian entity (0.4). Analyze tax comments from C. Siqueira regarding BRA Assignment and Assumption Agreement.	0.30	1,345.00	403.50
04/20/2024	Phuoc Anh Tram Nguyen	Discuss with Bui Thu Thuy (Mercafe Vietnam) regarding the final review of the merger filing dossier and the finalization of the financial numbers.	0.30	280.00	84.00
04/20/2024	Phuoc Anh Tram Nguyen	Translate the Short Form Stock Purchase Agreement into Vietnamese.	3.40	280.00	952.00
04/21/2024	Phuoc Anh Tram Nguyen	Continue to translate the Short Form Stock Purchase Agreement into Vietnamese.	3.60	280.00	1,008.00
04/21/2024	Phuoc Anh Tram Nguyen	Work on follow-up questions from Cuadra Del Carmen, Federico regarding the merger filing and registration of the legal representative.	1.70	280.00	476.00
04/21/2024	Zachary Bassen	Vietnam sale - review draft military bank payoff letter and correspondence regarding merger filing.	0.20	750.00	150.00
04/22/2024	Federico Cuadra Del Carmen	(0.5) Call with H. Light, Rothschild and Baker Teams to discuss request from VN Purchaser on closing timing; (1) Draft summary of approach regarding VN Purchaser's	2.40	1,345.00	3,228.00



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		request on closing timing; (0.9) Call with A. Morely (Rothschild) to discuss feedback from VN Purchaser on proposed approach to closing timing.			
04/22/2024	Jonathan Susko	Prepare for and participate in checklist call with Z. Bassen regarding closing deliveries; review, analyze and revise assignment and assumption agreement to incorporate comments from Brazilian corporate counsel.	0.90	1,125.00	1,012.50
04/22/2024	Paul Keenan	Conference with F. Cuadra regarding sale issues.	0.20	1,645.00	329.00
04/22/2024	Phuoc Anh Tram Nguyen	Discuss with BM tax team regarding the refund of the capital gain tax and prepare a brief note on the same.	0.30	280.00	84.00
04/22/2024	Steven Canner	Call with Federico regarding adjustment/ antitrust issue.	0.30	1,645.00	493.50
04/22/2024	Zachary Bassen	Call with Riveron to discuss updates with VN antitrust filing; review and revise closing documents.	0.70	750.00	525.00
04/22/2024	Zachary Bassen	Checklist call with J. Susko.	0.30	750.00	225.00
04/23/2024	Cecilia Reategui	Follow up on Apostille completed in Florida and submission for next step of the legalization of the document in Embassy of Vietnam.	0.40	455.00	182.00



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04/23/2024	Federico Cuadra Del Carmen	(1)Review draft BRA Assignment and Assumption Agreement prepared by J. Susko, drafting required updates.	1.00	1,345.00	1,345.00
04/23/2024	Hoang Anh Nguyen	Prepare response on signatories of Retention Agreement and MSA, and internal approval for MSA, review draft of investor's decision approving MSA.	1.40	480.00	672.00
04/23/2024	Jonathan Susko	Correspondence with F. Cuadra Del Carmen regarding the wiring instructions and payment mechanics in connection with the Brazil barter contracts sale; review, analyze and revise assignment, assumption and bill of sale to incorporate comments from local tax counsel; correspondence with local tax counsel re the same.	1.20	1,125.00	1,350.00
04/23/2024	Phuoc Anh Tram Nguyen	Discuss with Bui Thu Thuy (Mercafe Vietnam) regarding her comments on the merger filing dossier (0.3); update the same to the merger filing dossier and send the dossier to KPMG (0.5).	0.80	280.00	224.00
04/23/2024	Phuoc Anh Tram Nguyen	Prepare response to questions from Cuadra Del Carmen, Federico regarding the signatory of Mercafe	1.40	280.00	392.00



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		Vietnam Ltd. (0.9); consolidate comments from tax team regarding experience on adjustment of transfer price (0.1); discuss with Oanh Nguyen regarding thesignatory of Mercafe Vietnam Ltd. (0.1); update the finalize the response on the same (0.3).			
04/23/2024	Phuoc Anh Tram Nguyen	Review questions from BMUS on the signing of the Retention Agreement and the Mutual Separation Agreement (0.1); discuss with Nguyen Hoang Anh and prepare response to the same (0.4); prepare a decision of Mercafe Vietnam Ltd. approving the execution of the Mutual Separation Agreement (0.7).	1.20	280.00	336.00
04/23/2024	Silvia Bernardino	Review of the proposed language suggested by Jonathan regarding the assignment and assumption agreement and the information regarding the payment of the price in a bank account in the USA. Email with my comments regarding this.	0.80	685.00	548.00
04/23/2024	Zachary Bassen	Vietnam sale - Review officers certificate.	0.20	750.00	150.00



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04/24/2024	Federico Cuadra Del Carmen	(0.3) Call with J. Susko to discuss questions on BRA Assignment and Assumption Agreement; (1) Review updated draft BRA Assignment and Assumption Agreement provided by J. Susko.	1.30	1,345.00	1,748.50
04/24/2024	Jonathan Susko	Correspondence with F. Cuadra Del Carmen regarding the assignment and assumption agreement; revise assignment and assumption agreement to incorporate comments from F. Cuadra Del Carmen; prepare and send email to F. Cuadra Del Carmen regarding revisions to the assignment and assumption agreement and flow of funds; correspondence with local counsel regarding the assignment and assumption agreement; correspondence with Mercon regarding revisions to the assignment and assumption agreement.	0.70	1,125.00	787.50
04/24/2024	Lori Seavey	Telephone call with R. Sainvil regarding potential asset sale (.1); research re	0.30	465.00	139.50





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		precedent in SDNY same (.2).			
04/24/2024	Maribel Fontanez	Prepare shells for StoneX Sale Motion declarations.	0.60	465.00	279.00
04/24/2024	Paul Keenan	Correspondence and analysis regarding assumption and assignment agreement for Brazilian assets.	0.40	1,645.00	658.00
04/24/2024	Phuoc Anh Tram Nguyen	Attend a call with Bui Thu Thuy (Mercafe Vietnam) and Rothschild team.	0.50	280.00	140.00
04/24/2024	Phuoc Anh Tram Nguyen	Review the merger filing dossier updated by KPMG.	0.50	280.00	140.00
04/24/2024	Phuoc Anh Tram Nguyen	Prepare response to follow up questions from Cuadra Del Carmen, Federico regarding the signatory of Mercafe Vietnam Ltd.	0.70	280.00	196.00
04/24/2024	Zachary Bassen	Vietnam - review and revise closing documents.	0.20	750.00	150.00
04/25/2024	Cecilia Reategui	Process cost for legalization in Vietnam.	0.10	455.00	45.50
04/25/2024	Hoang Anh Nguyen	Update BVI company's decision on approval of MSA and authorized signatories for the same, update advice on signatory and internal approval.	1.60	480.00	768.00
04/25/2024	Maribel Fontanez	Prepare notice of sale of Purchased Assets.	0.30	465.00	139.50
04/25/2024	Paul Keenan	Multiple correspondence to finalize StoneX transaction and sale order.	0.60	1,645.00	987.00
04/25/2024	Reginald Sainvil	Continue to draft and	3.40	1,195.00	4,063.00



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04/25/2024	Zachary Bassen	revise motion and order regarding Specialty sale and related correspondence with purchaser's counsel. Vietnam sale - Attend to closing matters including review of merger filing dossier and other ancillary agreements.	0.50	750.00	375.00
04/25/2024	Zachary Bassen	US sale - Call with R. Sainvil to discuss purchased assets.	0.30	750.00	225.00
04/26/2024	Cecilia Reategui	Communication on issued legalization by Embassy of Vietnam.	0.20	455.00	91.00
04/26/2024	Federico Cuadra Del Carmen	(1)Draft updates to the Brazil Assignment and Assumption Agreement based on feedback from H. Light.	1.00	1,345.00	1,345.00
04/26/2024	Hoang Anh Nguyen	Prepare for and attend meeting with Director of Vietnam entities to obtain signatures to Retention Agreement and MSA, and explain the provisions therein.	2.10	480.00	1,008.00
04/26/2024	Maribel Fontanez	Draft motion to shorten notice for StoneX sale motion.	0.40	465.00	186.00
04/26/2024	Phuoc Anh Tram Nguyen	Separate the decision of the BVI company approving the execution of the Mutual Separation Agreement of each Vietnamese entity, and send the same to BMUS team.	0.40	280.00	112.00
04/26/2024	Zachary Bassen	Review and redline	0.20	750.00	150.00



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04/26/2024	Zachary Bassen	Brazil assignment and assumption agreement. Vietnam sale - coordinate execution of retention agreement and mutual separation agreement.	0.40	750.00	300.00
04/28/2024	Paul Keenan	Analysis of draft StoneX sale papers - motion, order and other documents - and revising same.	1.40	1,645.00	2,303.00
04/29/2024	Federico Cuadra Del Carmen	(.7)Draft updates to the Brazil Assignment and Assumption Agreement based on feedback from H. Light; Draft distribution cover note to.	0.70	1,345.00	941.50
04/30/2024	Federico Cuadra Del Carmen	(.6)Call with A. Morely and H. Light to discuss updates on VN closing.	0.40	1,345.00	538.00
04/30/2024	Hoang Anh Nguyen	Respond on options for countersigning MSA and Retention Agreement, and signatory appointment and signing protocol for decision of BVI company approving these agreements.	1.60	480.00	768.00
04/30/2024	Zachary Bassen	Coordinate appointment of second legal representative.	0.20	750.00	150.00

**B140-Relief from Stay/Adequate Protection**

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/18/2024	Paul Keenan	Conference with R. Weber regarding issues with stay violations.	0.20	1,645.00	329.00

**B150-Meetings of and Communications with Creditors**



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04/16/2024	Lori Seavey	Review notice of continuance of 341 meeting and update WIP calendar; emails with M. Fontanez re same (.3).	0.30	465.00	139.50

**B160-Fee/Employment Applications**

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/01/2024	Maribel Fontanez	Prepare Rothschild monthly fee statements; communicate with R. Sainvil regarding same.	0.70	465.00	325.50
04/01/2024	Maribel Fontanez	Communicate with Kroll regarding service of fee statements.	0.20	465.00	93.00
04/01/2024	Maribel Fontanez	Update, finalize, e-file and process for service supplemental OCP list; communicate with R. Sainvil regarding same.	0.60	465.00	279.00
04/01/2024	Maribel Fontanez	Prepare third monthly fee statement for GSX; communicate with R. Sainvil regarding same.	0.70	465.00	325.50
04/01/2024	Mark Bloom	Review of Demarest Brazil fee estimate; deadline reminders to foreign counsel on fee statement deadline, and followup on RESOR draft.	0.30	1,645.00	493.50
04/01/2024	Paul Keenan	Numerous correspondence regarding ordinary course professionals.	0.30	1,645.00	493.50
04/02/2024	Maribel Fontanez	Communicate with R. Sainvil regarding monthly statements of various professionals	1.20	465.00	558.00



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		(.4); update RESOR monthly fee statement (.6).			
04/02/2024	Maribel Fontanez	Update OCP tracker.	0.20	465.00	93.00
04/02/2024	Reginald Sainvil	Review and revise fee statements regarding RESOR and Rothschild.	0.40	1,195.00	478.00
04/04/2024	Maribel Fontanez	Prepare notice of rate increase for RESOR; communicate with R. Sainvil regarding same.	0.50	465.00	232.50
04/04/2024	Maribel Fontanez	Update monthly fee statement as per revised invoice.	0.70	465.00	325.50
04/04/2024	Maribel Fontanez	Update Rothschild monthly fee statements.	0.50	465.00	232.50
04/04/2024	Reginald Sainvil	Analyze and revise monthly statement regarding RESOR.	0.40	1,195.00	478.00
04/09/2024	Maribel Fontanez	Review OMM and Ankura monthly fee statements; communicate with R. Sainvil regarding same.	0.40	465.00	186.00
04/10/2024	Maribel Fontanez	Review Rothschild updated fee statements; communicate with R. Sainvil regarding same.	0.40	465.00	186.00
04/15/2024	Maribel Fontanez	Review further updated monthly fee statements for R&Co.	0.20	465.00	93.00
04/15/2024	Maribel Fontanez	Prepare second monthly fee statement for Resor; communicate with R. Sainvil regarding same.	0.70	465.00	325.50
04/15/2024	Maribel Fontanez	Prepare fourth	0.30	465.00	139.50



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04/16/2024	Maribel Fontanez	monthly fee statement for GSX. Finalize, efile and process for service Rothschild, GSX and RESOR fee statements; communicate with R. Sainvil regarding same.	2.50	465.00	1,162.50
04/16/2024	Maribel Fontanez	Commence preparing fourth monthly fee statement for Baker; prepare list of timekeepers and required information.	2.10	465.00	976.50
04/17/2024	Lori Seavey	Receive declaration from OCP QNT Law firm and draft notice of supplement to OCP list (.8); emails with R. Sainvil re same (.1); finalize draft and exhibit for filing (.3); attend to e-filing notice (.1); circulate to Kroll team for service (.1).	1.40	465.00	651.00
04/19/2024	Maribel Fontanez	Commence preparing BM first interim fee application.	1.60	465.00	744.00
04/23/2024	Maribel Fontanez	Continue drafting BM fee application.	2.20	465.00	1,023.00
04/24/2024	Maribel Fontanez	Continue working on fee application.	3.80	465.00	1,767.00
04/24/2024	Paul Keenan	Correspondence regarding supplemental declaration for Riveron retention.	0.20	1,645.00	329.00
04/25/2024	Maribel Fontanez	Draft fourth monthly fee statement for Riveron.	0.20	465.00	93.00
04/26/2024	Maribel Fontanez	Continue working on Baker McKenzie first	1.70	465.00	790.50



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/29/2024	Lori Seavey	interim fee application. Prepare list of retained ordinary course professionals (1.1); emails with R. Sainvil re same (.1); draft quarterly OCP statement (.3).	1.50	465.00	697.50
04/30/2024	Lori Seavey	Receive OCP quarterly statement attachment and update notice and compile for filing (.2); email to R. Sainvil re same (.1).	0.30	465.00	139.50
04/30/2024	Maribel Fontanez	Review various monthly fee statements; prepare summary of payments to be made by debtors; communicate with R. Sainvil regarding same.	0.70	465.00	325.50
04/30/2024	Maribel Fontanez	Prepare shell for Rothschild's fifth monthly fee statement; communicate with R. Sainvil regarding same.	0.20	465.00	93.00
04/30/2024	Maribel Fontanez	Finalize, e-file and process for service Riveron monthly fee statement; communicate with R. Sainvil regarding same.	0.40	465.00	186.00

**B185-Assumption/Rejection of Leases and Contracts**

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/02/2024	Maribel Fontanez	Assist with order extending deadline to assume/reject leases; retrieve entered order, process for service and update calendar	0.40	465.00	186.00



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		accordingly; communicate with R. Sainvil regarding same.			
<b>B190-Other Contested Matters</b>					
<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/01/2024	Paul Keenan	Correspondence and analysis regarding publication of notices in foreign countries.	0.30	1,645.00	493.50
04/01/2024	Reginald Sainvil	Analyze and address cash collateral issues.	0.70	1,195.00	836.50
04/01/2024	Thais Barboza	Daily analysis of the updated court records in order to verify possible measures to be taken on it, as requested by M. Conrado.	0.30	335.00	100.50
04/02/2024	Lori Seavey	Receive final motion to approve and implement modified protocol for foreign courts regarding WHOA proceeding and attend to e-filing (.2); emails with M. Fontanez re same (.1); coordinate delivery of Apostilled document to Brazil (.2)	0.50	465.00	232.50
04/02/2024	Maribel Fontanez	Update Motion to Modify JIN Guidelines; process same for service; communicate with M. Bloom regarding same.	1.70	465.00	790.50
04/02/2024	Paul Keenan	Correspondence and analysis regarding Dutch Observer questions on lien review.	0.50	1,645.00	822.50
04/02/2024	Paul Keenan	Correspondence and	0.40	1,645.00	658.00





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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/02/2024	Paul Keenan	analysis regarding court to court communication protocols. Conference with Riveron and Resor regarding plan of liquidation and other issues.	0.50	1,645.00	822.50
04/02/2024	Paul Keenan	Numerous correspondence and analysis regarding requests from observer.	0.80	1,645.00	1,316.00
04/02/2024	Paul Keenan	Analysis of motion on settlement procedures.	0.30	1,645.00	493.50
04/02/2024	Reginald Sainvil	Analyze secured collateral details.	0.40	1,195.00	478.00
04/02/2024	Thais Barboza	Daily analysis of the updated court records in order to verify possible measures to be taken on it, as requested by M. Conrado.	0.20	335.00	67.00
04/03/2024	Paul Keenan	Multiple correspondence and analysis in response to requests from observer.	0.50	1,645.00	822.50
04/03/2024	Paul Keenan	Review and revised memo of information requested by Dutch Observer.	0.50	1,645.00	822.50
04/03/2024	Paul Keenan	Conference call with Baker, OMM and CWT regarding plan of reorganization.	0.50	1,645.00	822.50
04/03/2024	Paul Keenan	Conference with Dutch WHOA Observer.	0.50	1,645.00	822.50
04/03/2024	Thais Barboza	Daily analysis of the updated court records in order to verify possible measures to	0.20	335.00	67.00



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/04/2024	Kim Tan	be taken on it, as requested by M. Conrado. Legalize the signature of S. Stemmler Genannt Parchen on three powers of attorney on behalf of Mercon B.V.; issue two true copies of the passport of S. Stemmler Genannt Parchen.	0.50	825.60	412.80
04/04/2024	Merredith Fong-Akan	Prepare legalization of the signature of S. Stemmler Genannt Parchen on a power of attorney on behalf of Mercon B.V. up to and including the embassy of Ethiopia; Prepare a true copy of the passport of S. Stemmler Genannt Parchen w up to and including the embassy of Ethiopia.	1.50	294.86	442.29
04/04/2024	Merredith Fong-Akan	Prepare legalization of the signature of S. Stemmler Genannt Parchen on two powers of attorney on behalf of Mercon B.V. with Apostille by the Court; Prepare a true copy of the passport of S. Stemmler Genannt Parchen with Apostille by the Court.	1.60	294.86	471.78
04/04/2024	Thais Barboza	Daily analysis of the updated court records in order to verify possible measures to be taken on it, as	0.20	335.00	67.00



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04/05/2024	Paul Keenan	requested by M. Conrado. Correspondence regarding foreign notice by publication.	0.20	1,645.00	329.00
04/05/2024	Paul Keenan	Correspondence and analysis regarding ruing in Dutch WHOA.	0.40	1,645.00	658.00
04/05/2024	Thais Barboza	Daily analysis of the updated court records in order to verify possible measures to be taken on it, as requested by M. Conrado.	0.20	335.00	67.00
04/08/2024	Kim Tan	Issue a true copy of the Minutes of the Extraordinary General Meeting of Shareholders of Agro International Holding B.V.	0.20	825.60	165.12
04/08/2024	Merredith Fong-Akan	Prepare a true copy of the Minutes of the Extraordinary General Meeting of Shareholders of Agro International Holding B.V. up to and including the embassy of Ethiopia.	1.00	294.86	294.86
04/08/2024	Merredith Fong-Akan	Arrange for an Apostilled extract of Mercon B.V. for use in Brazil.	0.50	294.86	147.43
04/08/2024	Paul Keenan	Correspondence and analysis regarding checklist for WHOA proceeding.	0.50	1,645.00	822.50
04/08/2024	Thais Barboza	Daily analysis of the updated court records in order to verify possible measures to be taken on it, as	0.20	335.00	67.00



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04/08/2024	Trung Nguyen Nguyen	requested by M. Conrado. Update checklist and application for supplement of 2nd legal rep for Dong Nai LLC and Lam Dong LLC.	1.60	200.00	320.00
04/09/2024	Merredith Fong- Akan	Send legalized documents of Mercon B.V. per e-mail and per courier to R. Marques (PL Brasil).	0.50	294.86	147.43
04/09/2024	Thais Barboza	Daily analysis of the updated court records in order to verify possible measures to be taken on it, as requested by M. Conrado.	0.20	335.00	67.00
04/10/2024	Thais Barboza	Daily analysis of the updated court records in order to verify possible measures to be taken on it, as requested by M. Conrado.	0.20	335.00	67.00
04/11/2024	Lori Seavey	Draft Certificate of no objection to motion to modify protocol and compile with proposed order and exhibits (.3); email to R. Sainvil re same (.1). Receive final approved forms and attend preparation and filing of certificate (.3); review court docket to confirm no objections and finalize CNO for filing (.1); compile and email to R. Sainvil for approval (.1); attend to e-filing	1.00	465.00	465.00



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04/11/2024	Thais Barboza	and circulate to Baker team (.1). Daily analysis of the updated court records in order to verify possible measures to be taken on it, as requested by M. Conrado.	0.20	335.00	67.00
04/11/2024	Thi Bich Hanh Phan	Consult with Lam Dong Industrial Zone Authority on specific legalization requirements for IRC amendment dossier.	0.50	140.00	70.00
04/12/2024	Eugenia Vazquez	Email regarding the liquidation of the company and resolving doubts in relation to the liquidator and the liquidation balance sheet.	1.00	503.94	503.94
04/12/2024	Thais Barboza	Daily analysis of the updated court records in order to verify possible measures to be taken on it, as requested by M. Conrado.	0.20	335.00	67.00
04/12/2024	Trung Nguyen Nguyen	Review the notarized translation of notary office regarding CoI of foreign investor.	0.30	200.00	60.00
04/15/2024	Maribel Fontanez	Retrieve and upload to imanage - insurance related documents; communicate with P. Keenan regarding same.	0.60	465.00	279.00
04/15/2024	Thais Barboza	Daily analysis of the updated court records in order to verify possible measures to be taken on it, as	0.20	335.00	67.00



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04/15/2024	Trung Nguyen Nguyen	requested by M. Conrado. Review client's comment and discuss with team on legalization of Luis' passport.	0.30	200.00	60.00
04/16/2024	Eugenia Vazquez	Liquidation of Spanish Mercon Entity - Prepare email regarding liabilities of the liquidators, and options to appoint liquidators as well as documents required from the company in order to liquidate.	1.00	503.94	503.94
04/16/2024	Merredith Fong- Akan	Prepare a true copy of the Director's Certificate of Agro International Holding B.V. up to and including the embassy of Vietnam.	1.00	294.86	294.86
04/16/2024	Thais Barboza	Daily analysis of the updated court records in order to verify possible measures to be taken on it, as requested by M. Conrado.	0.20	335.00	67.00
04/17/2024	Kim Tan	Issue a true copy of the Director's Certificate of Agro International Holding B.V.	0.20	825.60	165.12
04/17/2024	Thais Barboza	Daily analysis of the updated court records in order to verify possible measures to be taken on it, as requested by M. Conrado.	0.20	335.00	67.00
04/18/2024	Thais Barboza	Daily analysis of the updated court records	0.30	335.00	100.50



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04/19/2024	Clare Montgomery	in order to verify possible measures to be taken on it, as requested by M. Conrado. Review information on Mercon Colombia and its liquidation (0.3); and meeting with Mercon Colombia team on the liquidation (0.3).	0.60	740.00	444.00
04/19/2024	Thais Barboza	Daily analysis of the updated court records in order to verify possible measures to be taken on it, as requested by M. Conrado.	0.20	335.00	67.00
04/19/2024	Trung Nguyen Nguyen	Update application regarding replacement of legal representative upon confirmation on appointees' information; prepare signature pack for Luis and Duncan.	2.40	200.00	480.00
04/22/2024	Merredith Fong-Akan	Send legalized documents for Ethiopia per e-mail and per courier to M. Kassa (Lidet Abebe Tizazu Law Office).	0.50	294.86	147.43
04/22/2024	Thais Barboza	Daily analysis of the updated court records in order to verify possible measures to be taken on it, as requested by M. Conrado.	0.20	335.00	67.00
04/23/2024	Karen Santamaria	Phone call with C. Prado and Mercon team regarding the liquidation of Mercon's Colombian	3.50	620.00	2,170.00



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		subsidiary. (0.2); Review data room with company's bylaws and corporate documents. (0.5); Draft resolution of the shareholders assembly approving dissolution, consent letter of liquidator, proxy of shareholder (1.8); Email to C. Prado with obligations and responsibilities of liquidator (1.0).			
04/23/2024	Kim Tan	Issue true copy of the two Excerpts from the Commercial Register of Agro International Holding B.V.; issue true copy of the two Certificates of Incumbency of Agro International Holding B.V.	0.50	825.60	412.80
04/23/2024	Merredith Fong- Akan	Prepare a true copy of the two Excerpts from the Commercial Register of Agro International Holding B.V. with legalization up to and including the embassy of Ethiopia.	1.40	294.86	412.80
04/23/2024	Merredith Fong- Akan	Prepare a true copy of the two Certificates of Incumbency of Agro International Holding B.V. with legalization up to and including the embassy of Ethiopia.	1.40	294.86	412.80
04/23/2024	Paul Keenan	Correspondence regarding requirements for	0.30	1,645.00	493.50





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04/23/2024	Thais Barboza	winding down Colombian business. Daily analysis of the updated court records in order to verify possible measures to be taken on it, as requested by M. Conrado.	0.20	335.00	67.00
04/24/2024	Karen Santamaria	Email with client regarding pending information related to Colombian subsidiary.	0.20	620.00	124.00
04/24/2024	Paul Keenan	Analyzing outstanding Observer requests.	0.80	1,645.00	1,316.00
04/24/2024	Thais Barboza	Daily analysis of the updated court records in order to verify possible measures to be taken on it, as requested by M. Conrado.	0.20	335.00	67.00
04/25/2024	Paul Keenan	Analysis of decision in Brazilian ACC litigation.	0.40	1,645.00	658.00
04/25/2024	Paul Keenan	Numerous correspondence and analysis regarding providing of information to satisfy requests of Observer.	0.70	1,645.00	1,151.50
04/25/2024	Paul Keenan	Numerous correspondence with M. Bloom and Resor requirements requirements of WHOA proceeding and treatment of creditors.	0.40	1,645.00	658.00
04/25/2024	Thais Barboza	Daily analysis of the updated court records in order to verify possible measures to be taken on it, as	0.30	335.00	100.50



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04/26/2024	Paul Keenan	requested by M. Conrado. Multiple correspondence regarding status of proceedings in Brazil.	0.30	1,645.00	493.50
04/26/2024	Paul Keenan	Correspondence with Dutch BV director.	0.30	1,645.00	493.50
04/26/2024	Thais Barboza	Daily analysis of the updated court records in order to verify possible measures to be taken on it, as requested by M. Conrado.	0.20	335.00	67.00
04/29/2024	Paul Keenan	Analysis of issues arising under WHOA statute before call with Mercon BV director.	0.60	1,645.00	987.00
04/29/2024	Thais Barboza	Daily analysis of the updated court records in order to verify possible measures to be taken on it, as requested by M. Conrado.	0.20	335.00	67.00
04/30/2024	Thais Barboza	Daily analysis of the updated court records in order to verify possible measures to be taken on it, as requested by M. Conrado.	0.20	335.00	67.00

**B195-Non-Working Travel**

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/15/2024	Paul Keenan	Travel to New York to meet with CRO for upcoming hearing.	5.20	822.50	4,277.00
04/16/2024	Paul Keenan	Travel from New York to Miami after hearing and meetings with CRO.	5.40	822.50	4,441.50

**B210-Business Operations**



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04/02/2024	Matthew Smith	Review and provide comments to the draft Bankruptcy Motion regarding Procedures to Settle Certain Claims.	0.80	1,295.00	1,036.00
04/02/2024	Matthew Smith	Review and discuss termination of outstanding coffee contracts with various counterparties.	0.70	1,295.00	906.50
04/03/2024	Matthew Smith	Review and discuss termination of outstanding coffee contracts with various counterparties.	0.40	1,295.00	518.00
04/03/2024	Matthew Smith	Review and discuss counterparty consent rights under the Company's coffee contracts.	0.60	1,295.00	777.00
04/04/2024	Matthew Smith	Review and discuss counterparty consent rights under the Company's coffee contracts.	0.20	1,295.00	259.00
04/04/2024	Matthew Smith	Review and discuss rejection or termination of outstanding coffee contracts with various counterparties.	0.40	1,295.00	518.00
04/05/2024	Matthew Smith	Review and discuss rejection and termination of coffee contracts with various counterparties.	1.30	1,295.00	1,683.50
04/08/2024	Matthew Smith	Review and discuss Transaction Cancellation Agreements with various coffee contract counterparties.	0.90	1,295.00	1,165.50
04/08/2024	Matthew Smith	Review and discuss asset sale and	1.20	1,295.00	1,554.00



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04/09/2024	Matthew Smith	counterparty consent rights under the Company's coffee contracts. Review Transaction Cancellation Agreements with various coffee contract counterparties.	0.30	1,295.00	388.50
04/15/2024	Matthew Smith	Discuss Transaction Cancellation Agreements with various coffee contract counterparties.	0.10	1,295.00	129.50
04/18/2024	Silvia Bernardino	Review the email and questions of JSusko regarding the assignment agreements, coordination with G. Freitas the review required (0.4). Alignment with the tax team regarding the tax comments to be provided regarding the assignment agreements (0.4).	0.80	685.00	548.00
04/22/2024	Silvia Bernardino	Review of the changes made in the assignment assumption agreement by StoneX (0.4). Coordination with the tax team to review the tax comments (0.3). Review of the email of J.Susko with the comments to such document and the description of the Broker (0.2). Review of the agreement accordingly (0.4).	1.30	685.00	890.50
04/24/2024	Silvia Bernardino	Review of the	0.90	685.00	616.50



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		comments provided by F.Cuadra regarding the bank account in the USA (0.3). Review of the email of J.Susko regarding the assignement assumption agreement (0.3). Email to provide the clarifications requested by them (0.3).			

**B220-Employee Benefits/Pensions**

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/03/2024	Thi Phuong Thao Nguyen	Update mutual separation agreement with Biju Nair for Mercafe Agri based on finalized Retention Agreement (0.9); update mutual separation agreement with Biju Nair for Mercafe Vietnam based on finalized Retention Agreement and assumption of absence of labor contract (0.8).	1.70	230.00	391.00
04/05/2024	Thi Phuong Thao Nguyen	Consolidate mutual separation agreements of two Vietnam subsidiaries to create a template applicable to both companies for termination of employment with Biju Nair.	1.90	230.00	437.00

**B230-Financing/Cash Collateral**

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/01/2024	Kevin Whittam	Email with Cadwalader on cash collateral extension notice.	0.10	1,345.00	134.50



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04/01/2024	Maribel Fontanez	Prepare, finalize, e-file and process for service agenda for 04.03.2024 hearing; communicate with R. Sainvil regarding same.	0.90	465.00	418.50
04/01/2024	Maribel Fontanez	Prepare, finalize, e-file and process for service notice of hearing on final cash collateral order; communicate with R. Sainvil regarding same.	0.90	465.00	418.50
04/01/2024	Paul Keenan	Numerous correspondence and analysis regarding cash collateral negotiations.	0.60	1,645.00	987.00
04/01/2024	Paul Keenan	Analysis of outline regarding characterization of cash movements.	0.40	1,645.00	658.00
04/01/2024	Paul Keenan	Analysis of recent financial reports.	0.20	1,645.00	329.00
04/02/2024	Kevin Whittam	Coordinate matters involving Dutch release documents.	0.20	1,345.00	269.00
04/02/2024	Lori Seavey	Receive Seventh Notice to extend cash collateral and attend to e-filing and emails with A. Marcos re same (.2)	0.20	465.00	93.00
04/03/2024	Paul Keenan	Hearing on cash collateral.	0.50	1,645.00	822.50
04/03/2024	Paul Keenan	Revising cash collateral order.	0.40	1,645.00	658.00
04/04/2024	Kevin Whittam	Call with counsel to Dutch observer and Baker team members on lien matters.	0.40	1,345.00	538.00
04/04/2024	Paul Keenan	Conference call with Resor and Observer with K Whittam regarding lien review.	0.50	1,645.00	822.50



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04/04/2024	Paul Keenan	Numerous correspondence regarding final cash collateral order.	0.40	1,645.00	658.00
04/05/2024	Kevin Whittam	Discussions with M. Schofield on final cash collateral order.	0.10	1,345.00	134.50
04/05/2024	Paul Keenan	Conference with K. Whittam regarding cash collateral.	0.20	1,645.00	329.00
04/05/2024	Paul Keenan	Multiple correspondence and analysis regarding final cash collateral order.	0.50	1,645.00	822.50
04/05/2024	Paul Keenan	Conference with Rabobank and syndicate lender group, and follow up with CRO regarding same.	0.70	1,645.00	1,151.50
04/08/2024	Paul Keenan	Analysis of recent financial reports.	0.20	1,645.00	329.00
04/10/2024	Paul Keenan	Analysis of most recent financial reports.	0.30	1,645.00	493.50
04/11/2024	Paul Keenan	Conference with Rabobank and lender group and follow up regarding same.	0.50	1,645.00	822.50
04/17/2024	Kevin Whittam	Call with A. Marcos and G. Blackburn to discussion requirements for Dutch assignment agreement.	0.20	1,345.00	269.00
04/17/2024	Silvia Bernardino	Review of the assignment agreements of the purchase and sale of coffee entered into by Mercon number: 2456011, 245600, 2467157 from Mercon to StoneX (0.6);	1.40	685.00	959.00



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		Review of the assignment assumption agreement (0.4). Email to J.Susko to provide the revised draft, related comments and the additional information we need to review the tax impact of the assignments (0.4).			
04/18/2024	Kevin Whittam	Call with Reggie about financing items for disclosure statement.	0.20	1,345.00	269.00
04/18/2024	Paul Keenan	Telephone conference with Rabo and bank syndicate.	0.40	1,645.00	658.00
04/24/2024	Paul Keenan	Analysis of most recent financial reports.	0.30	1,645.00	493.50
04/25/2024	Paul Keenan	Analysis of financial reports.	0.20	1,645.00	329.00
04/25/2024	Paul Keenan	Conference with Rabo bank and syndicated lender group and follow up with CRO regarding same.	0.50	1,645.00	822.50
04/26/2024	Silvia Bernardino	Review of the comments of F.Cuadra and G.Campos (0.3) and email to provide the corporate documents and comments 0.2).	0.50	685.00	342.50

**B240-Tax Issues**

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/01/2024	Joseph Chung	Review and revise language regarding property tax apportionment.	0.50	750.00	375.00
04/01/2024	Ross Staine	Review and revise tax aspects of US APA to address provision	0.30	1,295.00	388.50





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04/14/2024	Ross Staine	relating to allocation of property tax liability. Review and consider tax aspects of APA relating to transfer of Brazilian contracts; email correspondence with BM corporate team regarding same.	0.40	1,295.00	518.00
04/16/2024	Camila Siqueira	Instructions received from S. Bernardino. Analysis of the 3 contracts of coffee stock orders, 1 contract consent and 1 assignment and assumption contract with T. Saraiva followed by discussion of the theme with him. Exchange e-mails with S. Bernardino and G. Freitas about the contracts.	2.40	370.00	888.00
04/16/2024	Telirio Saraiva	Tax analysis: Analysis coffee supply agreements and Assignment agreement; Internal discussions with CSiqueira regarding direct and indirect taxation of the Assignment.	0.70	750.00	525.00
04/17/2024	Camila Siqueira	Draft the questions to send to Baker Mckenzie team to confirm some tax comprehension followed by (i) alignments with T. Saraiva about the theme and (ii) send e-	3.90	370.00	1,443.00



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		mail to S. Bernardino and G. Freitas. Exchange e-mails with (i) J. Susko about important points for tax analysis and (ii) A. Stamato about the indirect tax issues. Alignments with T. Saraiva about the tax analysis followed by draft of the analysis.			
04/17/2024	Telirio Saraiva	Tax analysis: Draft doubts regarding the Assignment agreement and main assumptions of the analysis.	1.00	750.00	750.00
04/18/2024	Adriana Stamato	Discussions with TSaraiva and CSiqueira re. assingment of contracts; review and preparation of comments re. indirect taxes.	1.00	750.00	750.00
04/18/2024	Camila Siqueira	Alignments with T. Saraiva. Meeting with T. Saraiva and A. Stamato for alignments about tax issues and the contracts connected to the operation.	0.60	370.00	222.00
04/18/2024	Telirio Saraiva	Tax analysis: Email exchange with JSusko regarding doubts and assumptions of the Assignment; Conf. call with CSiqueira and AStamato to discuss indirect taxation of the Assignment; Draft message with tax comments.	1.50	750.00	1,125.00

**Baker  
McKenzie.****Matter Number:** 51171831  
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04/19/2024	Camila Siqueira	Alignments with T. Saraiva and S. Bernardino. Exchange e-mails with J. Susko about the tax analysis. Start reviewing the updated assignment and assumption agreement, as requested by J. Susko.	1.20	370.00	444.00
04/22/2024	Thi Thanh Hoa Dao	Discuss with AT. Nguyen regarding the issue of price adjustment and tax refund possibility. Review and revise draft response prepared by AT. Nguyen.	0.40	520.00	208.00
04/23/2024	Camila Siqueira	Meeting with T. Saraiva about the updated assignment and assumption agreement to discuss possible tax issues. Draft e-mail with T. Saraiva about tax important points.	1.40	370.00	518.00
04/23/2024	Telirio Saraiva	Tax analysis: Analysis tax aspects regarding the final version of the Assignment Agreement and draft email with our recommendations.	0.80	750.00	600.00
04/23/2024	Thi Thanh Hoa Dao	Correspond with AT. Nguyen the experience regarding tax exposure/process in the case of price adjustment.	0.20	520.00	104.00
04/24/2024	Telirio Saraiva	Tax analysis: Response to final doubts sent by JSusko.	0.50	750.00	375.00

**B260-Board of Directors Matters**



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04/01/2024	Eugenia Vazquez	Prepare memo regarding directors liability regime in Spain.	2.50	503.94	1,259.85
04/09/2024	Eugenia Vazquez	Prepare email with steps to proceed with liquidation of Mercon Europe, S.L.	1.50	503.94	755.91
04/18/2024	Eugenia Vazquez	Respond new questions in relation to the liability of directors in case of dissolution of a Spanish entity.	1.50	503.94	755.91

**B300-**

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/03/2024	Mark Bloom	Followup on harmonization of Chapter 11 and WHOA Plan terms, including communication with RSainvil (.3) and drafting of email response to RESOR questions regarding same (.7), weekly telephone conference with Observer team (.4).	1.40	1,645.00	2,303.00

**B310-Claims Administration and Objections**

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/01/2024	Maribel Fontanez	Research various newspapers for publication of claims notices; communicate with R. Sainvil regarding same.	0.20	465.00	93.00
04/01/2024	Reginald Sainvil	Analyze publication notice, prepare international publication list to address concerns	1.60	1,195.00	1,912.00



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		relating to sufficiency of bar date notice, and numerous correspondence regarding same.			
04/03/2024	Maribel Fontanez	Review claims bar date order; update calendar; process for service.	0.50	465.00	232.50
04/03/2024	Paul Keenan	Correspondence regarding claims bar date and notices for same.	0.30	1,645.00	493.50
04/03/2024	Reginald Sainvil	Analyze and address bar date notice, publication, and related issues connected to WHOA proceeding.	1.90	1,195.00	2,270.50
04/04/2024	Reginald Sainvil	Analyze and revise status of WHOA proceeding summary for bar date notice.	0.40	1,195.00	478.00
04/05/2024	Reginald Sainvil	Analyze sufficiency of notice regarding bar date packages.	0.80	1,195.00	956.00
04/08/2024	Reginald Sainvil	Analyze issues related to bar date notice service package.	0.60	1,195.00	717.00
04/08/2024	Reginald Sainvil	Correspondence regarding notices to the Vietnamese and Guatemalan taxing authorities.	0.30	1,195.00	358.50
04/16/2024	Lori Seavey	Emails with R. Sainvil re: bar date notice publication tear sheets for national and international news outlets (.2).	0.20	465.00	93.00

**B320-Plan and Disclosure Statement**

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
03/29/2024	Paul Keenan	Conference with J.	0.20	1,645.00	329.00



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		Dodd regarding plan issues.			
04/01/2024	Maribel Fontanez	Draft shell for motion to approve disclosure statement.	1.70	465.00	790.50
04/01/2024	Paul Keenan	Analysis of deadlines and open matters in chapter 11 case.	0.30	1,645.00	493.50
04/01/2024	Reginald Sainvil	Preparation of motion to approve disclosure statement.	1.80	1,195.00	2,151.00
04/02/2024	Paul Keenan	Correspondence and analysis regarding questions from FMO on plan of liquidation.	0.40	1,645.00	658.00
04/02/2024	Paul Keenan	Correspondence and analysis regarding revisions to plan of liquidation.	0.40	1,645.00	658.00
04/02/2024	Reginald Sainvil	Analyze plan issues identified in connection with Dutch WHOA.	3.10	1,195.00	3,704.50
04/02/2024	Reginald Sainvil	Telephone conference with Riveron team regarding plan of liquidation.	0.50	1,195.00	597.50
04/03/2024	Paul Keenan	Conference with J. Dodd regarding issues arising under plan of liquidation.	0.40	1,645.00	658.00
04/03/2024	Paul Keenan	Conference with R Sainvil regarding preparation of disclosure statement.	0.20	1,645.00	329.00
04/03/2024	Reginald Sainvil	Analyze issues arising in connection with intersection of issues with Dutch WHOA plan and Chapter 11 liquidating plan.	0.80	1,195.00	956.00
04/04/2024	Mark Bloom	Revision of draft Chapter 11 Plan per comments from RESOR (.9), and	1.80	1,645.00	2,961.00



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04/04/2024	Paul Keenan	exchange of multiple emails with LGlanzman regarding same (.9). Numerous correspondence with Resor regarding homologation of ch 11 plan.	0.50	1,645.00	822.50
04/04/2024	Reginald Sainvil	Analyze case law regarding confirmation issues and requirements in light of interconnected WHOA plan.	4.00	1,195.00	4,780.00
04/04/2024	Reginald Sainvil	Analyze issues arising from tax audits and impact on chapter 11 plan.	0.90	1,195.00	1,075.50
04/04/2024	Reginald Sainvil	Review and consider collective comments of UCC and Rabobank to the draft chapter 11 plan.	1.50	1,195.00	1,792.50
04/04/2024	Reginald Sainvil	Analyze and revise joint plan of liquidation.	3.10	1,195.00	3,704.50
04/05/2024	Mark Bloom	Further review of & revision of Chapter 11 Plan to address revisions and comments from RESOR (3.5), referral of tax questions internally (.2) and coordination regarding same including exchange of emails with Riveron and Baker team regarding Rabo milestones and US-Dutch timelines (.7).	4.40	1,645.00	7,238.00
04/05/2024	Paul Keenan	Conference with R. Sainvil regarding plan	0.30	1,645.00	493.50



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04/05/2024	Paul Keenan	revisions and other issues. Analysis of local rules and federal rules regarding timing for plan process.	0.60	1,645.00	987.00
04/05/2024	Reginald Sainvil	Analyze plan revisions and assess process for a joint confirmation hearing or separate confirmation hearings before the US and Dutch courts.	1.80	1,195.00	2,151.00
04/05/2024	Reginald Sainvil	Analyze proposed treatment of equity in Plan and consider alternatives in light of WHOA.	1.30	1,195.00	1,553.50
04/05/2024	Reginald Sainvil	Develop outline regarding plan process and timeline.	1.50	1,195.00	1,792.50
04/06/2024	Paul Keenan	Analysis of revised plan of liquidation and making revisions to same.	0.80	1,645.00	1,316.00
04/06/2024	Reginald Sainvil	Preparation of disclosure statement.	1.80	1,195.00	2,151.00
04/08/2024	Lori Seavey	Telephone call with R. Sainvil regarding comments to plan (.1); review plan comments from RESOR, committee, and Rabobank and import into current draft plan draft (2.8).	2.90	465.00	1,348.50
04/08/2024	Mark Bloom	Initial followup with RESOR on US and Dutch Plan issues as identified with RESOR & Riveron (.5); review of & incorporation of multiple revisions to draft Plan (.2); review	3.70	1,645.00	6,086.50





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04/08/2024	Michael Matthiesen	of & revision of draft Disclosure Statement (3.0). Telephone conference with R. Sainvil discussing reviews and edits to draft motion (0.9); Begin draft of Motion to Approve Disclosure Statement (1.6).	2.50	670.00	1,675.00
04/08/2024	Paul Keenan	Correspondence regarding comments from Dutch counsel to plan of liquidation.	0.30	1,645.00	493.50
04/08/2024	Paul Keenan	Correspondence and analysis regarding revisions to disclosure statement and plan.	0.50	1,645.00	822.50
04/08/2024	Paul Keenan	Drafting and revising disclosure statement.	1.40	1,645.00	2,303.00
04/08/2024	Reginald Sainvil	Prepare analysis regarding conditional approval of disclosure statement.	1.80	1,195.00	2,151.00
04/08/2024	Reginald Sainvil	Analyze and continue addressing comments to the Plan received from other major stakeholders in the Chapter 11 Cases.	2.90	1,195.00	3,465.50
04/08/2024	Reginald Sainvil	Analyze FMO plan comments.	0.70	1,195.00	836.50
04/08/2024	Reginald Sainvil	Continue drafting and revising disclosure statement.	3.40	1,195.00	4,063.00
04/09/2024	Lori Seavey	Compile precedents for motions to approve disclosure statement on interim basis (.2); telephone call and emails with R. Sainvil re same (.1); draft exhibits for motion to	1.30	465.00	604.50



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04/09/2024	Mark Bloom	approve disclosure statement (1.0). Further revision of draft Plan (1.0) & Disclosure Statement (.7), coordination of US and Dutch timelines (.2) and telephone conference with RESOR re integration of comments to harmonize Chapter 11 and WHOA Plans (2.2), and folowup on open items and further revisions from discussion (1.8); exchange of internal emails with GFox regarding Plan tax issues as affect foreign creditors (.3).	6.20	1,645.00	10,199.00
04/09/2024	Michael Matthiesen	Review and analyze edits from R. Sainvil regarding necessary edits in local rules, case law, and factual edits to Motion to Approve Disclosure Statement (0.5); Research relevant SDNY bankruptcy case law regarding Orders to Approve Disclosure Statements (2.2); Edit motion accordingly (1.4); Research relevant SDNY local rules relevant to Disclosure Statements (1.2); Edit motion accordingly (0.8); Telephone conference with R. Sainvil discussing	6.30	670.00	4,221.00



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		completed edits to draft motion and next steps (0.2).			
04/09/2024	Paul Keenan	Begin drafting and revising disclosure statement.	1.60	1,645.00	2,632.00
04/09/2024	Paul Keenan	Further correspondence and analysis regarding revisions to plan of liquidation.	0.50	1,645.00	822.50
04/09/2024	Paul Keenan	Numerous correspondence and analysis regarding proposed revision to plan of liquidation.	0.70	1,645.00	1,151.50
04/09/2024	Paul Keenan	Telephone conference with Resor regarding WHOA plan process and follow up regarding same.	0.80	1,645.00	1,316.00
04/09/2024	Paul Keenan	Conference with R. Sainvil regarding preparation of disclosure statement.	0.30	1,645.00	493.50
04/09/2024	Reginald Sainvil	Preparation of motion to approve disclosure statement and related procedures.	2.60	1,195.00	3,107.00
04/09/2024	Reginald Sainvil	Continue development of disclosure statement and plan.	2.40	1,195.00	2,868.00
04/09/2024	Reginald Sainvil	Analysis regarding creditors list and alignment of WHOA plan considerations.	0.40	1,195.00	478.00
04/09/2024	Reginald Sainvil	Begin analysis regarding disputed claims for purposes of solicitation of the liquidating plan.	0.60	1,195.00	717.00
04/09/2024	Reginald Sainvil	Telephone conference with US and Dutch teams regarding plan of liquidation.	1.00	1,195.00	1,195.00



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04/09/2024	Reginald Sainvil	Analyze information required for sanctioning of Dutch WHOA Plan and assess necessary alignment of disclosure statement with US and Dutch procedures.	1.80	1,195.00	2,151.00
04/10/2024	John Dodd	Calls with R. Sainvil regarding plan and disclosure statement provisions (.2); review and analyze multiple correspondence regarding Chapter 11 and WHOA plan integration (.3); call with P. Keenan regarding scope and text of plan releases (.4).	0.90	1,345.00	1,210.50
04/10/2024	Lori Seavey	Continue drafting exhibits for motion to approve disclosure statement (1.0); circulate draft to R. Sainvil (.1).	1.10	465.00	511.50
04/10/2024	Mark Bloom	Review of Plan and Disclosure Statement revisions and related milestones from cash collateral order (.6), and series of email exchanges and telephone conference with LKortman regarding coordination of same, treatment of Dutch SME creditors, and related topics (1.8); exchange of emails with GCampos regarding Plan provisions affecting	2.70	1,645.00	4,441.50



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04/10/2024	Paul Keenan	Mercon Brasil, and need for relief in aid and enforcement of Plan in Brazil (.3). Analyzing and drafting disclosure statement.	1.70	1,645.00	2,796.50
04/10/2024	Paul Keenan	Analyzing and revising draft plan of liquidation.	1.20	1,645.00	1,974.00
04/10/2024	Paul Keenan	Analysis of release language and revising same.	0.80	1,645.00	1,316.00
04/10/2024	Paul Keenan	Numerous correspondence and analysis regarding requirements of WHOA proceeding for plan of liquidation.	0.60	1,645.00	987.00
04/10/2024	Paul Keenan	Analysis of classification of claims and determining appropriate treatment for each class.	0.80	1,645.00	1,316.00
04/10/2024	Paul Keenan	Correspondence with insurance counsel regarding releases.	0.40	1,645.00	658.00
04/10/2024	Paul Keenan	Researching scope of releases under SDNY case law.	0.70	1,645.00	1,151.50
04/10/2024	Reginald Sainvil	Analysis regarding coordination of timelines with the US Chapter 11 Plan and Dutch WHOA Plan.	1.00	1,195.00	1,195.00
04/10/2024	Reginald Sainvil	Preparation of further detailed description of postpetition events in Nicaragua.	1.20	1,195.00	1,434.00
04/10/2024	Reginald Sainvil	Continue drafting and revising plan and disclosure statement.	3.00	1,195.00	3,585.00
04/10/2024	Reginald Sainvil	Address numerous correspondence related to development	1.20	1,195.00	1,434.00



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04/10/2024	Reginald Sainvil	of the Plan and Disclosure Statement. Analyze issues arising with respect to treatment of Class 4B claims as defined in the draft plan of liquidation.	1.30	1,195.00	1,553.50
04/11/2024	John Dodd	Review and comment on placement of FMO loans in capital structure in connection with preparations of chapter 11 plan and questions of WHOA Observer (.4); comment on liquidating trust provisions of draft chapter 11 plan and strategy and timing for combined hearing on disclosure statement and plan (.5); call with P. Keenan, R. Sainvil, R. Weber, and H. Light regarding plan terms relating to release and privilege issues (.7).	1.60	1,345.00	2,152.00
04/11/2024	Maribel Fontanez	Research order setting combined hearing.	0.50	465.00	232.50
04/11/2024	Maribel Fontanez	Work on motion exhibits and order approving disclosure statement.	5.40	465.00	2,511.00
04/11/2024	Mark Bloom	Review of updated draft Plan as circulated to Rabo and Creditors Committee, and related preparation for (.5) & participation in telephone conference with Rabobank and Committee counsel	2.40	1,645.00	3,948.00



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		(1.0), and followup on same (.3); planning for final pre-filing revision of same and for coordination with RESOR and Observer (.4), and for coordination with Brazil team and client on conveyance of assets to Liquidating Trust, wind-down of business, relief in Brazil ancillary case (.2).			
04/11/2024	Paul Keenan	Researching precedent plans and opinions regarding transfer of privilege in liquidating plans.	1.30	1,645.00	2,138.50
04/11/2024	Paul Keenan	Further research of precedent plans and opinions regarding transfer of privilege in liquidating plans.	0.80	1,645.00	1,316.00
04/11/2024	Paul Keenan	Further research of precedent plans and opinions regarding transfer of privilege in liquidating plans.	1.40	1,645.00	2,303.00
04/11/2024	Paul Keenan	Drafting and revising language in plan regarding releases and terms of transfer of privilege.	1.20	1,645.00	1,974.00
04/11/2024	Paul Keenan	Conference with Baker attorneys and CRO regarding transfer of privilege and scope of releases, and follow up analysis regarding same.	1.30	1,645.00	2,138.50
04/11/2024	Paul Keenan	Conference with counsel for Rabo and UCC regarding initial	0.80	1,645.00	1,316.00



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		comments to plan and disclosure statement, and follow up correspondence regarding same.			
04/11/2024	Reginald Sainvil	Conduct legal research and analysis regarding transferred privileges.	2.00	1,195.00	2,390.00
04/11/2024	Reginald Sainvil	Correspondence regarding universe of Dutch Law SME claims.	0.40	1,195.00	478.00
04/11/2024	Reginald Sainvil	Continue preparation of motion to approve disclosure statement.	2.80	1,195.00	3,346.00
04/11/2024	Reginald Sainvil	Continue preparation of solicitation materials to be included with proposed disclosure statement order.	3.40	1,195.00	4,063.00
04/11/2024	Reginald Sainvil	Prepare analysis regarding optional mechanisms for joint hearing or voting procedures for US and Dutch WHOA liquidation plans.	1.40	1,195.00	1,673.00
04/11/2024	Reginald Sainvil	Strategy conference with Baker team regarding privilege and releases.	0.50	1,195.00	597.50
04/12/2024	Maribel Fontanez	Prepare notice of filing plan supplement.	1.00	465.00	465.00
04/12/2024	Maribel Fontanez	Assist in preparation of motion for combined hearing, ballots and other exhibits; communicate with R. Sainvil regarding same.	4.10	465.00	1,906.50
04/12/2024	Mark Bloom	Final pre-filing revision of draft Plan & Disclosure Statement (1.7),	4.70	1,645.00	7,731.50





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		analysis of issues raised in April 11 telephone conference with Rabo and Committee counsel (2.1), and coordination with RESOR regarding multiple Plan issues and Dutch law considerations (.9).			
04/12/2024	Paul Keenan	Analysis of Resor comments to plan and revisions needed to accommodate same.	0.50	1,645.00	822.50
04/12/2024	Paul Keenan	Analysis of plan and DS provisions related to transfer of privilege and limitations on same.	0.80	1,645.00	1,316.00
04/12/2024	Paul Keenan	Conference with Baker team regarding terms of plan and disclosure statement, and follow up revisions and analysis of same.	1.20	1,645.00	1,974.00
04/12/2024	Paul Keenan	Close analysis of requirements for SME creditors in Netherlands and determining plan revisions required for same.	0.80	1,645.00	1,316.00
04/12/2024	Paul Keenan	Analysis of plan language related to debtors and third party releases, and determining scope of same.	0.80	1,645.00	1,316.00
04/12/2024	Paul Keenan	Analysis of initial comments from Rabo's counsel to plan.	0.70	1,645.00	1,151.50
04/12/2024	Paul Keenan	Correspondence with FMO's counsel	0.40	1,645.00	658.00



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04/12/2024	Reginald Sainvil	regarding desired revisions to plan. Conduct legal research regarding release issues.	3.50	1,195.00	4,182.50
04/12/2024	Reginald Sainvil	Analysis regarding best interests test in context of plan and WHOA and numerous correspondence regarding same.	1.10	1,195.00	1,314.50
04/12/2024	Reginald Sainvil	Analyze scope of releases, milestones, and presumptions arising in the WHOA proceeding and numerous correspondence regarding related issues.	2.70	1,195.00	3,226.50
04/12/2024	Reginald Sainvil	Further analysis and discussion regarding mark-up of the plan circulated by Rabobank and UCC.	0.70	1,195.00	836.50
04/12/2024	Reginald Sainvil	Analyze case law regarding privilege issues.	1.00	1,195.00	1,195.00
04/13/2024	John Dodd	Review and comment regarding plan provisions relating to transfer of legal privileges (.5); call with H. Light, P. Keenan, R. Weber, and R. Sainvil regarding same (1.2).	1.70	1,345.00	2,286.50
04/13/2024	Paul Keenan	Correspondence and analysis regarding revised plan of liquidation.	0.80	1,645.00	1,316.00
04/13/2024	Paul Keenan	Drafting and revising plan provisions regarding releases and transfer of privileges.	1.30	1,645.00	2,138.50



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04/13/2024	Paul Keenan	Conference with CRO, R Sainvil, R Weber, and J Dodd regarding scope and limit of releases by debtors and third parties, and terms of transfer of privilege.	1.30	1,645.00	2,138.50
04/13/2024	Reginald Sainvil	Strategy conference with P. Keenan, R. Weber, H. Light, and J. Dodd regarding legal privilege issues related to Chapter 11 Plan.	1.20	1,195.00	1,434.00
04/14/2024	Mark Bloom	Preparation for (.3) & participation in telephone conference with Rabo & UCC counsel regarding open Chapter 11 plan issues -- Dutch law and WHOA issues, FMO, privileges (.7), and followup on Dutch law issues (.5).	1.50	1,645.00	2,467.50
04/14/2024	Paul Keenan	Conference with M Bloom and R Sainvil regarding status of plan negotiations and revisions.	0.30	1,645.00	493.50
04/14/2024	Paul Keenan	Conference with counsel for Rabo and UCC regarding plan negotiations and status.	0.70	1,645.00	1,151.50
04/14/2024	Paul Keenan	Conference with M Bloom and R Sainvil regarding status of plan negotiations and revisions.	0.40	1,645.00	658.00
04/14/2024	Paul Keenan	Analysis of draft liquidation analysis for Mercon BV for WHOA plan.	0.40	1,645.00	658.00



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04/14/2024	Reginald Sainvil	Telephone conference with counsel for Rabobank and UCC regarding plan issues.	1.00	1,195.00	1,195.00
04/15/2024	John Dodd	Review draft liquidation analysis and comments thereto (.2); review chapter 11 plan comments relating to WHOA proceeding (.4); reviewing plan revisions (1); call with P. Keenan, B. Cahn, R. Sainvil, and R. Weber regarding plan issues (1.4).	3.00	1,345.00	4,035.00
04/15/2024	Mark Bloom	Followup on open Plan issues and further revision of draft Plan -- Dutch WHOA and classification issues, SME creditors, liquidation analysis, best interest tests and other confirmation issues (1.6), and exchange of multiple emails with Riveron & RESOR regarding all of foregoing (1.2); planning for April 16 telephone conference with Riveron regarding draft liquidation analysis, and telephone conference with MichaelS, Krijn regarding draft (.4); review of Committee/ Rabo revision of Privileges section of Plan, and planning for	3.50	1,645.00	5,757.50



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04/15/2024	Paul Keenan	advice to client regarding same (.3). Multiple conferences with R. Sainvil and others regarding issues raised by creditors under plan and disclosure statement.	1.30	1,645.00	2,138.50
04/15/2024	Reginald Sainvil	Analyze UCC revised plan provisions to address insurance issues with respect to legal privileges under the plan.	0.70	1,195.00	836.50
04/15/2024	Reginald Sainvil	Analysis of potential creditor treatment and strategic considerations regarding plan classification and 1129 requirements and Dutch sanctioning requirements.	2.70	1,195.00	3,226.50
04/15/2024	Reginald Sainvil	Continued analysis of plan issues, privileges, and releases and alignment of WHOA proceeding.	3.80	1,195.00	4,541.00
04/15/2024	Reginald Sainvil	Strategy conference with Baker team regarding plan issues.	1.40	1,195.00	1,673.00
04/15/2024	Reginald Sainvil	Review and distinguish precedent relied upon by UCC counsel for proposed plan modifications.	0.80	1,195.00	956.00
04/16/2024	John Dodd	Review and analyze multiple plan issues including plan releases, transfer/ waiver of privileges and protections, coordination with WHOA and Brazil recognition	1.60	1,345.00	2,152.00



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04/16/2024	Mark Bloom	proceeding, and strategy considerations vis-a-vis Rabobank and the UCC. Update on Plan negotiations with Rabo and Committee, US and Dutch timelines, and planning for resolution of same (.4); planning for Brazil ancillary filings to enforce Plan, incl. series of email exchanges with Trench Rossi, Brazil management regarding identification of multiple issues and coordination of same (1.2), and for incorporation into Plan Procedures Motion (with RWeber) (.3); telephone conference with RESOR and Riveron regarding Plan features, recovery sharing and "best interests" test (1.6), and followup in revision of draft Plan for Rabo & Committee counsel (.3).	3.40	1,645.00	5,593.00
04/16/2024	Paul Keenan	Meetings with CRO and R. Sainvil in preparation for hearing and to discuss ongoing plan issues.	0.80	1,645.00	1,316.00
04/16/2024	Paul Keenan	Numerous correspondence re requirements for SME creditors under	0.60	1,645.00	987.00



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04/16/2024	Paul Keenan	WHOA statute and changes needed to plan of liquidation. Correspondence from counsel to UCC regarding revisions requested to plan.	0.60	1,645.00	987.00
04/16/2024	Reginald Sainvil	Further analysis and research regarding bases for separate classification of convenience claims and SME claims and consider impact of late-presented SME claims.	1.80	1,195.00	2,151.00
04/16/2024	Reginald Sainvil	Analysis regarding sharing arrangement between Rabobank and creditors and assess sufficiency of disclosures in disclosure statement.	1.20	1,195.00	1,434.00
04/16/2024	Reginald Sainvil	Continue to review and revise motion for approval of disclosure statement and related solicitation materials and procedures.	1.70	1,195.00	2,031.50
04/16/2024	Reginald Sainvil	Analyze FMO comments to the Plan and address FMO concerns.	1.30	1,195.00	1,553.50
04/17/2024	Maribel Fontanez	Work on related exhibits; communicate with R. Sainvil regarding same.	0.90	465.00	418.50
04/17/2024	Mark Bloom	Review of email exchanges regarding open issues in Chapter 11 Plan, review of relevant Code sections and Plan provisions (.6) and related preparation for (.4) &	3.70	1,645.00	6,086.50



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		participation in telephone conference with Rabo and Committee counsel regarding those issues (1.1), and initial followup on affected Plan provisions (1.2); telephone conference with Krijn regarding coordination of Chapter 11 and WHOA Plans, communications with Observer, timing considerations (.2); exchange of multiple emails with Brazil client and Trench Rossi regarding Plan and asset disposition issues (.2).			
04/17/2024	Paul Keenan	Conference with senior management team regarding current terms of proposed plan of liquidation.	0.50	1,645.00	822.50
04/17/2024	Paul Keenan	Drafting and revising plan based on comments of creditors and Resor.	0.80	1,645.00	1,316.00
04/17/2024	Paul Keenan	Conference call with counsel for Rabo and UCC regarding terms of plan and follow up conferences with R. Sainvil regarding same.	1.20	1,645.00	1,974.00
04/17/2024	Paul Keenan	Conference with CRO and senior management team regarding plan and numerous open issues; follow up regarding same.	0.90	1,645.00	1,480.50





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04/17/2024	Paul Keenan	Close analysis of plan in preparation for call with Rabobank.	0.80	1,645.00	1,316.00
04/17/2024	Reginald Sainvil	Analyze case law regarding third party releases and opt in and opt out procedures.	2.20	1,195.00	2,629.00
04/18/2024	Maribel Fontanez	Research opt-out forms.	0.30	465.00	139.50
04/18/2024	Mark Bloom	Drafting of email to RESOR team with update on Chapter 11 Plan and Dutch law issues from 17 April telephone conference with Rabo and Committee counsel (.6); review of applicable Plan provisions and planning for clarification of Litigation recoveries in Disclosure Statement for best interests test (1.2), and telephone conference with Riveron regarding same (.2).	2.00	1,645.00	3,290.00
04/18/2024	Paul Keenan	Conference with J. Dodd regarding plan negotiations.	0.30	1,645.00	493.50
04/18/2024	Paul Keenan	Multiple conferences with CRO regarding plan negotiations.	0.30	1,645.00	493.50
04/18/2024	Paul Keenan	Conference with counsel for Rabo regarding terms of plan of liquidation.	0.40	1,645.00	658.00
04/18/2024	Paul Keenan	Numerous correspondence and analysis regarding plan provisions.	0.60	1,645.00	987.00
04/18/2024	Reginald Sainvil	Strategy conference with Baker and	0.50	1,195.00	597.50

**Baker  
McKenzie.**

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04/18/2024	Reginald Sainvil	Riveron teams regarding plan of liquidation. Continue to analyze and revise plan-related documents and address open plan issues, including issues related to development and alignment of Dutch WHOA and US Chapter 11 plans.	2.80	1,195.00	3,346.00
04/19/2024	John Dodd	Call with P. Keenan and R. Sainvil regarding release and privilege provisions in draft chapter 11 plan of liquidation (.2); prepare for and attend call with H. Light, R. Sainvil, UCC, and Rabobank regarding same (.5); follow up call with R. Sainvil regarding same (.3); review multiple correspondence regarding same (.2).	1.20	1,345.00	1,614.00
04/19/2024	Maribel Fontanez	Edits to notices and ballots.	1.40	465.00	651.00
04/19/2024	Maribel Fontanez	Gather information needed for Plan; communicate with M. Bloom and others regarding same.	0.20	465.00	93.00
04/19/2024	Maribel Fontanez	Research prepacked cases.	0.40	465.00	186.00
04/19/2024	Mark Bloom	Further planning for coordination of Plan approval and enforcement processes in US, Netherlands and Brazil (.7), and series of internal and	4.80	1,645.00	7,896.00



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		RESOR, Trench Rossi emails addressing approval and enforcement issues (2.1); review of & revision of draft Plan Procedures Motion (1.2) and related sections of Plan and Disclosure Statement (.8).			
04/19/2024	Paul Keenan	Conference with R. Sainvil regarding status of plan negotiations.	0.20	1,645.00	329.00
04/19/2024	Reginald Sainvil	Further analysis regarding release and privilege issues arising from draft plan of liquidation and numerous correspondence regarding same.	1.20	1,195.00	1,434.00
04/19/2024	Reginald Sainvil	Further analyze and revise plan procedures motion and numerous related correspondence.	2.70	1,195.00	3,226.50
04/19/2024	Reginald Sainvil	Analyze issues related to implementation of certain plan provisions in Brazilian ancillary case.	1.60	1,195.00	1,912.00
04/19/2024	Reginald Sainvil	Strategic discussions regarding D&O cap on recoveries.	0.50	1,195.00	597.50
04/20/2024	Mark Bloom	Review of updated and revised draft Plan Procedures Motion, and planning for coordination of Dutch and Brazilian timelines.	0.90	1,645.00	1,480.50
04/20/2024	Paul Keenan	Conference with R.	0.40	1,645.00	658.00



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04/21/2024	John Dodd	Sainvil regarding revisions to plan. Call with R. Sainvil regarding chapter 11 plan third-party releases.	0.30	1,345.00	403.50
04/21/2024	Mark Bloom	Review of updated draft Plan and related preparation for (.4) & participation in telephone conference with Rabo and Committee counsel regarding timing and substance issues (.6), and followup including Dutch and Brazilian cooperation (.2) , revision of draft Disclosure Statement (1.2).	2.40	1,645.00	3,948.00
04/21/2024	Reginald Sainvil	Telephone conference with J. Dodd regarding plan issues.	0.30	1,195.00	358.50
04/21/2024	Reginald Sainvil	Telephone conference with counsel to Rabobank and UCC regarding plan and disclosure statement issues.	0.60	1,195.00	717.00
04/21/2024	Reginald Sainvil	Analyze and revise chapter 11 plan and disclosure statement to address concerns raised by other major stakeholders.	1.00	1,195.00	1,195.00
04/22/2024	Lori Seavey	Emails with R. Sainvil regarding motion to shorten hearing on disclosure statement (.1); research re same (.4).	0.50	465.00	232.50
04/22/2024	Maribel Fontanez	Prepare notice of non-voting and opt-out form; communicate	1.10	465.00	511.50



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04/22/2024	Maribel Fontanez	with R. Sainvil regarding same. Assist in preparation of plan and disclosure statement; communicate with R. Sainvil regarding same.	2.20	465.00	1,023.00
04/22/2024	Mark Bloom	Followup on open items from 21 April telephone conference with Rabo and Committee counsel, including further revision of draft Disclosure Statement, Plan and Procedures Motion (.8), series of email exchanges with RESOR regarding Disclosure Statement language on WHOA Plan and process, timing considerations (.8), partial participation in telephone conference with RESOR & Riveron regarding WHOA process, claims and Plan issues (.4).	2.00	1,645.00	3,290.00
04/22/2024	Paul Keenan	Close analysis of plan of liquidation and further revision of same.	2.30	1,645.00	3,783.50
04/22/2024	Paul Keenan	Close analysis of plan of liquidation and revising same.	1.30	1,645.00	2,138.50
04/22/2024	Paul Keenan	Conference with Resor and Riveron regarding SME issue and calculations, and potential plan revisions.	0.80	1,645.00	1,316.00



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04/22/2024	Paul Keenan	Conference with R. Sainvil regarding plan revisions.	0.20	1,645.00	329.00
04/22/2024	Reginald Sainvil	Draft and revise motion for approval of disclosure statement.	2.50	1,195.00	2,987.50
04/22/2024	Reginald Sainvil	Analyze classes of claims and asses disparate treatment concerns.	1.70	1,195.00	2,031.50
04/22/2024	Reginald Sainvil	Continue to draft and revise motion to approve disclosure statement and related exhibits, including ballots, notices, and proposed order.	3.00	1,195.00	3,585.00
04/22/2024	Reginald Sainvil	Continue to draft and revise the disclosure statement.	2.30	1,195.00	2,748.50
04/23/2024	Mark Bloom	Selective review of & revision of updated draft Plan and related preparation for (.8) & participation in telephone conference with Rabo and Committee counsel regarding filing and cross-border issues with Dutch WHOA Plan (.9); series of email exchanges regarding coordination of US, Dutch and Brazil timing, sequencing and processes (.2); further revision of draft Disclosure Statement (.2); review of Riveron Convenience and SME Class Analysis, and exchange of internal emails regarding	2.70	1,645.00	4,441.50

**Baker  
McKenzie.**

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04/23/2024	Paul Keenan	consistency with Plan Treatment terms (.6). Conference with director and shareholder regarding status of ch 11 case and plan negotiations.	0.90	1,645.00	1,480.50
04/23/2024	Paul Keenan	Numerous correspondence and analysis regarding convenience and Dutch SME class and classifications schemes to enable approval of both Dutch and chapter 11 plan.	0.60	1,645.00	987.00
04/23/2024	Paul Keenan	Drafting and revising motion for approval of disclosure statement and scheduling plan confirmation.	1.20	1,645.00	1,974.00
04/23/2024	Paul Keenan	Numerous correspondence and analysis regarding requests for plan revisions.	1.20	1,645.00	1,974.00
04/23/2024	Paul Keenan	Conference with Rabo's counsel regarding VHOA and Ch 11 plan coordination and correspondence regarding same.	0.70	1,645.00	1,151.50
04/23/2024	Paul Keenan	Correspondence and analysis regarding comments from Rabo and UCC to plan of liquidation.	1.30	1,645.00	2,138.50
04/23/2024	Reginald Sainvil	Continue to review and revise the plan, disclosure statement, and disclosure statement motion and	3.70	1,195.00	4,421.50



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04/24/2024	Maribel Fontanez	numerous related correspondence. Prepare shell for 1L Term Loan Ballot; communicate with R. Sainvil regarding same.	1.90	465.00	883.50
04/24/2024	Mark Bloom	Followup on cross-border issues relating to Plan -- exchange of emails with RESOR regarding PAn language re Dutch WHOA Proceeding and Plan (.6), preparation for & participation in telephone conference with Santander counsel regarding Plan treatment and Brazil clarification order, enforcement (.6), and followup with HLight regarding same (.2); planning for reconciliation of Plan terms to Riveron SME and Convenience Class claims analysis (.2).	1.40	1,645.00	2,303.00
04/24/2024	Paul Keenan	Numerous correspondence from Resor and Observer regarding requests from Observer and issues arising under WHOA statute regarding ability to confirm ch 11 plan under WHOA statute.	0.80	1,645.00	1,316.00
04/25/2024	Maribel Fontanez	Edits to motion to approve disclosure statement;	1.30	465.00	604.50





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04/25/2024	Mark Bloom	communicate with P. Keenan and R. Sainvil. Followup email exchanges with counsel on cross-border issues relating to Chapter 11 plan confirmation and implementation, necessary modifications to accommodate local law issues -- Netherlands (.4), Brazil (.3); preparation for & participation in telephone conference with RESOR and Observer regarding riming and process for Plans and relarted issues (.5), and followup emails with RESOR, HLight regarding same, future of WHOA Plan and negotiations with Observer (1.2).	2.40	1,645.00	3,948.00
04/25/2024	Paul Keenan	Analysis of draft disclosure statement order and revising same.	0.90	1,645.00	1,480.50
04/25/2024	Paul Keenan	Finalizing draft of plan of liquidation.	0.40	1,645.00	658.00
04/25/2024	Paul Keenan	Numerous correspondence to and from Observer regarding requests from Observer in support of Dutch plan.	0.50	1,645.00	822.50
04/25/2024	Paul Keenan	Further analysis of draft of motion for approval of disclosure statement and scheduling motion.	0.50	1,645.00	822.50



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04/25/2024	Paul Keenan	Analysis of draft of motion for approval of disclosure statement and scheduling motion.	1.20	1,645.00	1,974.00
04/25/2024	Paul Keenan	Analysis of FMO's comments to plan of liquidation.	0.40	1,645.00	658.00
04/25/2024	Paul Keenan	Revising plan of liquidation.	0.40	1,645.00	658.00
04/25/2024	Paul Keenan	Finalizing motion to approve disclosure statement and forwarding to creditors.	0.60	1,645.00	987.00
04/25/2024	Reginald Sainvil	Analyze and address issues concerning implementation of plan in foreign jurisdictions.	1.10	1,195.00	1,314.50
04/26/2024	Maribel Fontanez	Assist in edits to disclosure statement.	2.60	465.00	1,209.00
04/26/2024	Maribel Fontanez	Edits to disclosure statement, per P. Keenan.	1.20	465.00	558.00
04/26/2024	Mark Bloom	Planning for filing of Plan, Disclosure Statement and Plan Procedures Motion, incl. series of telephone conferences and email exchanges with HLight, PKeenan, RSainvil regarding claim classification and Dutch WHOA issues, open points for discussion with Rabo and professionals (1.2), further consideration of Dutch WHOA issues and recommendations for resolution of same,	1.70	1,645.00	2,796.50



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		impacts of various courses of action (.5).			
04/26/2024	Paul Keenan	Revising disclosure statement.	1.40	1,645.00	2,303.00
04/26/2024	Paul Keenan	Revising plan of liquidation.	0.40	1,645.00	658.00
04/26/2024	Paul Keenan	Correspondence and analysis with R. Sainvil regarding local rules on disclosure statement motion.	0.40	1,645.00	658.00
04/26/2024	Paul Keenan	Further revision of disclosure statement.	0.40	1,645.00	658.00
04/26/2024	Paul Keenan	Initial analysis of draft notices and other exhibits to DS motion.	0.60	1,645.00	987.00
04/26/2024	Paul Keenan	Initial analysis of draft ballots.	0.70	1,645.00	1,151.50
04/26/2024	Reginald Sainvil	Analyze and revise ballots, notices, and related solicitation materials.	1.60	1,195.00	1,912.00
04/26/2024	Reginald Sainvil	Conduct further research and analysis to determine whether necessary to seek combined balloting for US Plan and Dutch WHOA plan.	1.50	1,195.00	1,792.50
04/27/2024	Paul Keenan	Further revisions to ballots, opt out forms and other attachments to disclosure statement.	1.30	1,645.00	2,138.50
04/27/2024	Paul Keenan	Drafting and revising motion to shorten notice.	1.20	1,645.00	1,974.00
04/27/2024	Paul Keenan	Finalizing ballots and other exhibits to disclosure statement motion.	1.40	1,645.00	2,303.00
04/27/2024	Paul Keenan	Finalizing plan and disclosure statement and circulating same to Rabo and UCC.	2.20	1,645.00	3,619.00



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/28/2024	Paul Keenan	Correspondence and analysis regarding UCC and Rabo comments to plan, ballots and other attachments to disclosure statement.	1.30	1,645.00	2,138.50
04/28/2024	Paul Keenan	Analysis of UCC and Rabo comments to disclosure statement and revising same.	0.80	1,645.00	1,316.00
04/29/2024	Mark Bloom	Telephone conferences with Krijn regarding Plan and Disclosure Statement, conformity with Dutch law regarding best interests test and treatment of SME creditors (.9), and followup on same including review of RESOR and Riveron SME calculations and exchange of multiple emails with RESOR & Riveron regarding same and Plan funding, effect of Election under Dutch law (1.6).	2.50	1,645.00	4,112.50
04/29/2024	Paul Keenan	Conference with Mercon BV director and Resor regarding issues arising under WHOA plan.	0.50	1,645.00	822.50
04/29/2024	Paul Keenan	Conference with Resor regarding approval of ch. 11 plan in the Netherlands.	0.50	1,645.00	822.50
04/29/2024	Reginald Sainvil	Continue to analyze and revise plan and disclosure statement in light of Dutch WHOA proceeding and issues	1.50	1,195.00	1,792.50



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/29/2024	Reginald Sainvil	flagged by Rabobank and the UCC. Analyze issues regarding SME creditor claims and numerous related correspondence.	2.40	1,195.00	2,868.00
04/30/2024	Lori Seavey	Telephone call with R. Sainvil regarding preparation of plan exhibits and latest plan version redline circulations (.1); prepare redlines as directed (.4); emails with R. Sainvil re same (.1).	0.60	465.00	279.00
04/30/2024	Mark Bloom	Followup on status of Plan & Disclosure Statement and pending amendments, planning for discussions with Rabo & Committee counsel re Dutch WHOA and disclosure issues (.3), and exchange of emails with Krijn and RESOR team regarding WHOA Plan calculations, legal requirements and waiver (.4).	0.70	1,645.00	1,151.50

**B400-Bankruptcy-Related Advice**

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/01/2024	Mariana Conrado	Conference with sworn translators to request fees proposal to have translated the Order Authorizing Debtor Mercon Coffee Corporation to Act as Foreign Representative of the	0.40	545.00	218.00



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/02/2024	Mariana Conrado	Debtors duly appostiled. Review the final version of the Motion to Modify JIN Guidelines, as requested by MBloom. Additional adjustments on the power of attorney to be sent to Demarest team, as requested by GCampos. Prepare the delegation of powers to Mr. Vinicius. Conference with the conflict attorney (Mr. Vinicius) to discuss the fees proposal to be sent to EUA.	0.70	545.00	381.50
04/03/2024	Jeroen Posthumus	Prepare Brazilian docs for legalization meeting with S. Stemmler Gennant Parchen.	0.30	337.75	101.33
04/04/2024	Jeroen Posthumus	Prepare for and attend legalization meeting with S. Stemmler Gennant Parchen; perform required post meeting actions to process the legalizations.	1.00	337.75	337.75
04/08/2024	Mariana Conrado	Review the updated court copies of the case to verify possible measures to be taken on it. Conference with Santander's to discuss their position on the case and the possibility to settle it. Exchange emails with PKennan to inform him about the call received from	0.80	545.00	436.00



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		Santander today and to discuss the next measures to be taken about it.			
04/09/2024	Cecilia Pastor	Revise advice on winding up options.	0.50	670.13	335.07
04/15/2024	Mariana Conrado	Conference with GCampes, MBloom and Mercon Brazil team to discuss the measures to be taken regarding the transfer of the subsidiary in Brazil to the liquidation trustee. Exchange emails with Harve Light to confirm how to address the matter before Santander.	0.50	545.00	272.50
04/17/2024	Mariana Conrado	Review the current status of the case to verify possible measures to be taken on it. Exchange emails with the team to inform it on the status of the case.	0.40	545.00	218.00
04/24/2024	Mariana Conrado	Conference call with Santander on the status of the negotiations regarding chapter 11. Conference with Harve Ligth to discuss some aspects of the status of the case in Brazil versus the position of the banks.	0.70	545.00	381.50
<b>B410-General Bankruptcy Advice/Opinions</b>					
<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/01/2024	Thijs Bogaers	Correspondences with client and Baker Team regarding the	0.60	611.16	366.70



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		legalization of various documents and preparing the assignment of a receivable agreement.			
04/02/2024	Gledson Marques de Campos	Review the case. Conversation with creditors' attorneys on how to proceed at the US Court.	1.50	850.00	1,275.00
04/02/2024	Thijs Bogaers	Correspondences with client regarding the setting up of a identification meeting with the director of Mercon B.V.	0.60	611.16	366.70
04/03/2024	Gledson Marques de Campos	Conversation with creditors' attorneys on how to proceed at the US Court. Case law study on the necessity to request the ratification of the plan to be presented in the US.	5.90	850.00	5,015.00
04/03/2024	Rocio Gonzalez	Review E. Vazquez email regarding insolvency issues.	0.50	552.19	276.10
04/03/2024	Thijs Bogaers	Manage and coordinate the setting up of a meeting with the sole managing director of Mercon B. V., includes reviewing and editing the documents that are to be signed during said meeting and correspondences with Baker team and client regarding the same.	1.10	611.16	672.28
04/04/2024	Thijs Bogaers	Attend meeting with S. Stemmler (Mercon) regarding true identification of her	1.30	611.16	794.51





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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		signature and the execution of various documents, includes follow-up correspondences with Mercon Team and Baker Team regarding the legalization of said documents.			
04/05/2024	Thijs Bogaers	Manage and coordinate the legalization of various documents for use in Vietnam, Ethiopia and Brazil, includes coordinating the retrieval of the original documents at the DLA office and multiple correspondences with Mercon Team and Baker Team regarding the same (1.2); Review and edit the draft assignment agreement for the assignment of the BVI payable from Mercon B.V. to BVI Holdco (1.1).	2.30	611.16	1,405.67
04/08/2024	Gledson Marques de Campos	Attend a meeting with creditor interested in discussing the status of the Chpater 11.	2.80	850.00	2,380.00
04/08/2024	Thijs Bogaers	Review, edit and circulate the draft Assignment and Assumption Agreement and the draft Assignment Agreement for the 18k receivable (1.7); manage and coordinate the	2.60	611.16	1,589.02



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		legalization of various documents for use in Ethiopia and Brazil, includes correspondences with Mercon Team and Baker Amsterdam Team regarding the same (0.9).			
04/09/2024	Gustavo Freitas	Review of the Coffee Purchase and Sale Agreement entered into by Mercon Brasil Comércio de Café Ltda. and local coffee sellers, no. 2456044, 2467157 and 2456011, e-mail correspondence to J, Susko and F. Del Carmen (BM Miami) regarding the reviewed documents.	4.10	335.00	1,373.50
04/09/2024	Thijs Bogaers	Review, edit and circulate the draft Assignment and Assumption Agreement and the draft Assignment Agreement for the 18k receivable, includes correspondence with Resor Team regarding the same (1.6); manage and coordinate the legalization of various documents for use in Brazil, includes correspondences with Mercon Team and Baker Amsterdam Team regarding the same (0.3).	0.90	611.16	550.04
04/10/2024	Gledson Marques de Campos	Discuss the plan and the necessity to	2.20	850.00	1,870.00



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		request its recognition in Brazil.			
04/11/2024	Gledson Marques de Campos	Exchange emails regarding the plan to be presented.	0.60	850.00	510.00
04/11/2024	Thijs Bogaers	Review, edit and circulate the draft Assignment Agreements, includes correspondences with Baker US Team regarding the same (0.9); correspondences with Mercon Team regarding the legalization of various documents for Mercon B.V. (0.3).	1.20	611.16	733.39
04/12/2024	Thijs Bogaers	Manage and coordinate the finalization of the draft Assignment Agreements, includes correspondences with Baker US Team and Resor Team regarding the same.	0.70	611.16	427.81
04/15/2024	Thijs Bogaers	Review, edit and circulate the Assignment and Assumption Agreement, includes correspondences with Baker US Team and Resor Team regarding the same (0.8); Manage and coordinate the legalization of various documents for use in Vietnam, includes working session with Baker Amsterdam Team (0.4).	1.20	611.16	733.39
04/16/2024	Thijs Bogaers	Correspondences with	0.60	611.16	366.70



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		Baker US Team and Resor Team regarding the finalization of the draft Assignment Agreements (0.3); manage and coordinate the legalization of the various documents for use in Vietnam, includes correspondences with Mercon Team and Baker Amsterdam Team (0.3).			
04/17/2024	Gledson Marques de Campos	Analyze the decision rendered. Answer to the questions raised by Baker. Attend a call with creditors.	7.10	850.00	6,035.00
04/17/2024	Gustavo Freitas	Review and update of the Coffee Purchase and Sale Agreement entered into by Mercon Brasil Comércio de Café Ltda. and local coffee sellers, no. 2456044, 2467157 and 2456011, and Assignment and Assumption Agreement in order to include provisions regarding the Brazilian jurisdiction; e-mail correspondence to J, Susko and F. Del Carmen (BM Miami) regarding the reviewed documents.	4.10	335.00	1,373.50
04/17/2024	Thijs Bogaers	Correspondences with Baker US Team regarding the NY-law governed rights of pledge and their	0.30	611.16	183.35



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/18/2024	Gledson Marques de Campos	insertion into the draft Assignment Agreements. Answer to the questions raised by Baker. Attend a call with creditors to explain the decision issued in the recognition.	4.10	850.00	3,485.00
04/18/2024	Thijs Bogaers	Regiew the Chapter 11 letter received by our Amsterdam Office and share findings with Baker US Team (0.2); review the amendments made by Baker US Team to the draft Assignment and Assumption Agreement (0.2).	0.40	611.16	244.46
04/22/2024	Gledson Marques de Campos	Attend call with creditors. Attend call with Mercon Brazil to address questions. Review the assignment of agreement.	5.90	850.00	5,015.00
04/22/2024	Thijs Bogaers	Manage and coordinate the legalization of various documents for use in Ethiopia and Vietnam, includes correspondences with Baker Amsterdam and Mercon Team regarding the same.	0.90	611.16	550.04
04/23/2024	Gledson Marques de Campos	Attend call with creditors (financial institutions). Answer the questions.	4.10	850.00	3,485.00
04/23/2024	Thijs Bogaers	Manage and coordinate the legalization of various	0.30	611.16	183.35



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/24/2024	Thijs Bogaers	documents for use in Vietnam, includes correspondences with Baker Amsterdam regarding the same. Manage and coordinate the legalization of various documents for use in Vietnam, includes correspondences with Baker Amsterdam regarding the same.	0.20	611.16	122.23
04/25/2024	Thijs Bogaers	Review the Chapter 11 notice as delivered to our Amsterdam Office and share findings with Baker US Team (0.6); review the documents forwarded to the Vietnamese Embassy and share findings with Client, includes working session with Baker Amsterdam Team (0.5).	1.10	611.16	672.28
04/29/2024	Gledson Marques de Campos	Attend call with creditors. Attend call with Mercon Brazil to address questions.	2.90	850.00	2,465.00
04/29/2024	Thijs Bogaers	Manage and coordinate the legalization of various documents for use in Ethiopia, includes correspondences with Baker Amsterdam and client regarding the same.	0.30	611.16	183.35
04/30/2024	Gledson Marques de Campos	Attend call with creditors to explain the plan.	1.40	850.00	1,190.00
04/30/2024	Thijs Bogaers	Manage and coordinate the	0.20	611.16	122.23



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		legalization of various documents for use in Ethiopia, includes correspondences with Baker Amsterdam and client regarding the same.			
Total Hours: 907.90			Total:	927,974.32 USD	



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## Time Summary

### B100-Administration

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Federico Cuadra Del Carmen	76.10	1,345.00	102,354.50
Silvia Bernardino	1.70	685.00	1,164.50
<b>Total</b>	<b>B100-Administration</b>		<b>103,519.00</b>

### B110-Case Administration

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Ana Marcos	11.10	795.00	8,824.50
Cecilia Reategui	2.40	455.00	1,092.00
Federico Cuadra Del Carmen	0.30	1,345.00	403.50
Lori Seavey	8.20	465.00	3,813.00
Mariana Conrado	2.00	545.00	1,090.00
Maribel Fontanez	9.50	465.00	4,417.50
Mark Bloom	9.10	1,645.00	14,969.50
Paul Keenan	14.30	1,645.00	23,523.50
Reginald Sainvil	11.40	1,195.00	13,623.00
<b>Total</b>	<b>B110-Case Administration</b>		<b>71,756.50</b>

### B120-Asset Analysis and Recovery

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Oanh Nguyen	6.80	950.00	6,460.00
Paul Keenan	2.20	1,645.00	3,619.00
Ronald Ohren	0.50	1,270.00	635.00
<b>Total</b>	<b>B120-Asset Analysis and Recovery</b>		<b>10,714.00</b>

### B130-Asset Disposition

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Cecilia Reategui	2.40	455.00	1,092.00
Estefania Lalinde	0.80	750.00	600.00
Federico Cuadra Del Carmen	15.70	1,345.00	21,116.50
Grace Blackburn	39.70	850.00	33,745.00





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Hoang Anh Nguyen	18.60	480.00	8,928.00
Jonathan Susko	32.60	1,125.00	36,675.00
Kai Kramer	0.70	1,545.00	1,081.50
Lori Seavey	2.10	465.00	976.50
Maribel Fontanez	7.40	465.00	3,441.00
Paul Keenan	9.30	1,645.00	15,298.50
Phuoc Anh Tram Nguyen	55.90	280.00	15,652.00
Reginald Sainvil	25.70	1,195.00	30,711.50
Silvia Bernardino	2.00	685.00	1,370.00
Steven Canner	1.70	1,645.00	2,796.50
Tuan Minh Le	0.30	350.00	105.00
Zachary Bassen	26.70	750.00	20,025.00
<b>Total</b>		<b>B130-Asset Disposition</b>	<b>193,614.00</b>

**B140-Relief from Stay/Adequate Protection**

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Paul Keenan	0.20	1,645.00	329.00
<b>Total</b>		<b>B140-Relief from Stay/Adequate Protection</b>	<b>329.00</b>

**B150-Meetings of and Communications with Creditors**

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Lori Seavey	0.30	465.00	139.50
<b>Total</b>		<b>B150-Meetings of and Communications with Creditors</b>	<b>139.50</b>

**B160-Fee/Employment Applications**

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Lori Seavey	3.20	465.00	1,488.00
Maribel Fontanez	22.70	465.00	10,555.50
Mark Bloom	0.30	1,645.00	493.50
Paul Keenan	0.50	1,645.00	822.50
Reginald Sainvil	0.80	1,195.00	956.00
<b>Total</b>		<b>B160-Fee/Employment Applications</b>	<b>14,315.50</b>

**B185-Assumption/Rejection of Leases and Contracts**

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
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Maribel Fontanez	0.40	465.00	186.00
<b>Total</b>	<b>B185-Assumption/Rejection of Leases and Contracts</b>		<b>186.00</b>

**B190-Other Contested Matters**

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Clare Montgomery	0.60	740.00	444.00
Eugenia Vazquez	2.00	503.94	1,007.88
Karen Santamaria	3.70	620.00	2,294.00
Kim Tan	1.40	825.60	1,155.84
Lori Seavey	1.50	465.00	697.50
Maribel Fontanez	2.30	465.00	1,069.50
Merredith Fong-Akan	9.40	294.86	2,771.68
Paul Keenan	9.70	1,645.00	15,956.50
Reginald Sainvil	1.10	1,195.00	1,314.50
Thais Barboza	4.70	335.00	1,574.50
Thi Bich Hanh Phan	0.50	140.00	70.00
Trung Nguyen Nguyen	4.60	200.00	920.00
<b>Total</b>	<b>B190-Other Contested Matters</b>		<b>29,275.90</b>

**B195-Non-Working Travel**

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Paul Keenan	10.60	822.50	8,718.50
<b>Total</b>	<b>B195-Non-Working Travel</b>		<b>8,718.50</b>

**B210-Business Operations**

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Matthew Smith	6.90	1,295.00	8,935.50
Silvia Bernardino	3.00	685.00	2,055.00
<b>Total</b>	<b>B210-Business Operations</b>		<b>10,990.50</b>

**B220-Employee Benefits/Pensions**

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Thi Phuong Thao Nguyen	3.60	230.00	828.00
<b>Total</b>	<b>B220-Employee Benefits/Pensions</b>		<b>828.00</b>

**B230-Financing/Cash Collateral**

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
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Kevin Whittam	1.20	1,345.00	1,614.00
Lori Seavey	0.20	465.00	93.00
Maribel Fontanez	1.80	465.00	837.00
Paul Keenan	6.80	1,645.00	11,186.00
Silvia Bernardino	1.90	685.00	1,301.50
<b>Total</b>		<b>B230-Financing/Cash Collateral</b>	<b>15,031.50</b>

**B240-Tax Issues**

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Adriana Stamato	1.00	750.00	750.00
Camila Siqueira	9.50	370.00	3,515.00
Joseph Chung	0.50	750.00	375.00
Ross Staine	0.70	1,295.00	906.50
Telirio Saraiva	4.50	750.00	3,375.00
Thi Thanh Hoa Dao	0.60	520.00	312.00
<b>Total</b>		<b>B240-Tax Issues</b>	<b>9,233.50</b>

**B260-Board of Directors Matters**

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Eugenia Vazquez	5.50	503.94	2,771.67
<b>Total</b>		<b>B260-Board of Directors Matters</b>	<b>2,771.67</b>

**B300-**

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Mark Bloom	1.40	1,645.00	2,303.00
<b>Total</b>		<b>B300-</b>	<b>2,303.00</b>

**B310-Claims Administration and Objections**

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Lori Seavey	0.20	465.00	93.00
Maribel Fontanez	0.70	465.00	325.50
Paul Keenan	0.30	1,645.00	493.50
Reginald Sainvil	5.60	1,195.00	6,692.00
<b>Total</b>		<b>B310-Claims Administration and Objections</b>	<b>7,604.00</b>

**B320-Plan and Disclosure Statement**

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
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John Dodd	10.30	1,345.00	13,853.50
Lori Seavey	6.40	465.00	2,976.00
Maribel Fontanez	26.20	465.00	12,183.00
Mark Bloom	61.50	1,645.00	101,167.50
Michael Matthiesen	8.80	670.00	5,896.00
Paul Keenan	72.60	1,645.00	119,427.00
Reginald Sainvil	119.20	1,195.00	142,444.00
<b>Total</b>		<b>B320-Plan and Disclosure Statement</b>	<b>397,947.00</b>

**B400-Bankruptcy-Related Advice**

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Cecilia Pastor	0.50	670.14	335.07
Jeroen Posthumus	1.30	337.75	439.08
Mariana Conrado	3.50	545.00	1,907.50
<b>Total</b>		<b>B400-Bankruptcy-Related Advice</b>	<b>2,681.65</b>

**B410-General Bankruptcy Advice/Opinions**

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Gledson Marques de Campos	38.50	850.00	32,725.00
Gustavo Freitas	8.20	335.00	2,747.00
Rocio Gonzalez	0.50	552.20	276.10
Thijs Bogaers	16.80	611.16	10,267.50
<b>Total</b>		<b>B410-General Bankruptcy Advice/ Opinions</b>	<b>46,015.60</b>

**Total Hours 907.90 Total Fees 927,974.32 USD**



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RE: Chapter 11 Cases

**Time Details**

**B100-Administration**

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/01/2024	Federico Cuadra Del Carmen	(1.5) Tend to correspondence from Project Mocha, drafting updates and responses as required; (0.4) Call with Mercon Management, Riveron and Baker Teams to discuss deal updates and open action items.	1.90	1,345.00	2,555.50
05/02/2024	Federico Cuadra Del Carmen	(1.2) Tend to correspondence from Project Mocha, drafting updates and responses as required; (0.5) Call with Senior Creditors to discuss transaction updates.	1.70	1,345.00	2,286.50
05/03/2024	Federico Cuadra Del Carmen	(1) Tend to correspondence from Project Mocha, drafting updates and responses as required; (0.5) Call with Mercon Management, Riveron and Baker Teams to discuss deal updates and open action items.	1.50	1,345.00	2,017.50
05/05/2024	Federico Cuadra Del Carmen	Tend to correspondence from Project Mocha, drafting updates and responses as required.	0.80	1,345.00	1,076.00
05/06/2024	Federico Cuadra Del Carmen	(1.8) Tend to correspondence from Project Mocha, drafting updates and responses as required; (0.5) Call with Mercon Management, Riveron	2.30	1,345.00	3,093.50



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/07/2024	Federico Cuadra Del Carmen	and Baker Teams to discuss deal updates and open action items. (.6) Tend to correspondence from Project Mocha, drafting updates and responses as required; (0.5) Call with majority shareholder to share transaction update.	0.50	1,345.00	672.50
05/08/2024	Federico Cuadra Del Carmen	(1.7) Tend to correspondence from Project Mocha, drafting updates and responses as required; (0.5) Call with Mercon Management, Riveron and Baker Teams to discuss deal updates and open action items; (0.3) Mercon Sale Motion	2.50	1,345.00	3,362.50
05/09/2024	Federico Cuadra Del Carmen	(1.2) Tend to correspondence from Project Mocha, drafting updates and responses as required; (0.5) Call with Senior Creditors to discuss transaction updates.	1.70	1,345.00	2,286.50
05/09/2024	Silvia Bernardino	Review of the email of J.Susko regarding the timing for the signature of the agreements to be assigned (0.2); email to him to provide the clarifications requested (0.2).	0.40	685.00	274.00
05/10/2024	Federico Cuadra Del Carmen	(1.4) Tend to correspondence from Project Mocha, drafting updates and	1.80	1,345.00	2,421.00



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/10/2024	Silvia Bernardino	responses as required; (0.4) Call with Mercon Management, Riveron and Baker Teams to discuss deal updates and open action items. E-mail to J.Susko to answer his questions regarding the execution process of the assignment agreement.	0.30	685.00	205.50
05/13/2024	Federico Cuadra Del Carmen	(1) Tend to correspondence from Project Mocha, drafting updates and responses as required; (0.5) Call with Mercon Management, Riveron and Baker Teams to discuss deal updates and open action items.	1.50	1,345.00	2,017.50
05/14/2024	Federico Cuadra Del Carmen	(1) Tend to correspondence from Project Mocha, drafting updates and responses as required; (0.3) Omnibus hearing re: Disclosure Schedules.	1.30	1,345.00	1,748.50
05/15/2024	Federico Cuadra Del Carmen	(1) Tend to correspondence from Project Mocha, drafting updates and responses as required; (0.5) Call with Mercon Management, Riveron and Baker Teams to discuss deal updates and open action items.	1.50	1,345.00	2,017.50
05/16/2024	Federico Cuadra Del Carmen	(1) Tend to correspondence from Project Mocha, drafting updates and responses as required;	1.20	1,345.00	1,614.00



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05/17/2024	Federico Cuadra Del Carmen	(0.2) Status call with Senior Lender Syndicate. (1.4) Tend to correspondence from Project Mocha, drafting updates and responses as required;	1.70	1,345.00	2,286.50
05/20/2024	Federico Cuadra Del Carmen	(0.3) Call with Mercon Management, Riveron and Baker Teams to discuss deal updates and open action items. (1) Tend to correspondence from Project Mocha, drafting updates and responses as required;	1.60	1,345.00	2,152.00
05/21/2024	Federico Cuadra Del Carmen	(0.6) Call with Mercon Management, Riveron and Baker Teams to discuss deal updates and open action items. Tend to correspondence from Project Mocha, drafting updates and responses as required.	1.20	1,345.00	1,614.00
05/22/2024	Federico Cuadra Del Carmen	(1.3) Tend to correspondence from Project Mocha, drafting updates and responses as required; (0.7) Call with Mercon Management, Riveron and Baker Teams to discuss deal updates and open action items.	2.00	1,345.00	2,690.00
05/23/2024	Federico Cuadra Del Carmen	(1.2) Tend to correspondence from Project Mocha, drafting updates and responses as required; (0.4) Status call with	1.60	1,345.00	2,152.00





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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/24/2024	Federico Cuadra Del Carmen	Senior Lender Syndicate. (1.1) Tend to correspondence from Project Mocha, drafting updates and responses as required; (0.3) Call with Mercon Management, Riveron and Baker Teams to discuss deal updates and open action items.	1.40	1,345.00	1,883.00
05/25/2024	Federico Cuadra Del Carmen	(0.4) Tend to correspondence from Project Mocha, drafting updates and responses as required.	0.40	1,345.00	538.00
05/26/2024	Federico Cuadra Del Carmen	(0.3) Tend to correspondence from Project Mocha, drafting updates and responses as required.	0.30	1,345.00	403.50
05/27/2024	Federico Cuadra Del Carmen	(1) Tend to correspondence from Project Mocha, drafting updates and responses as required.	1.00	1,345.00	1,345.00
05/28/2024	Federico Cuadra Del Carmen	(1.5) Tend to correspondence from Project Mocha, drafting updates and responses as required.	1.50	1,345.00	2,017.50
05/29/2024	Federico Cuadra Del Carmen	(1.1) Tend to correspondence from Project Mocha, drafting updates and responses as required; (0.3) Call with Mercon Management, Riveron and Baker Teams to discuss deal updates and open action items.	1.40	1,345.00	1,883.00
05/30/2024	Federico Cuadra Del Carmen	(1.6) Tend to correspondence from Project Mocha,	1.90	1,345.00	2,555.50



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/31/2024	Federico Cuadra Del Carmen	drafting updates and responses as required; (0.3) Call with Senior Lenders to discuss transaction updates. (3) Tend to correspondence from Project Mocha, drafting updates and responses as required; (0.3) Call with Mercon Management, Riveron and Baker Teams to discuss deal updates and open action items.	3.30	1,345.00	4,438.50

**B110-Case Administration**

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/01/2024	Lori Seavey	Conference call with R. Sainvil and M. Fontanez regarding WIP and upcoming deadlines (.4).	0.40	465.00	186.00
05/01/2024	Paul Keenan	Telephone conference with CRO regarding various issues.	0.20	1,645.00	329.00
05/01/2024	Paul Keenan	Follow up telephone conference with CRO regarding various issues.	0.20	1,645.00	329.00
05/01/2024	Paul Keenan	Analysis of most recent financial reports.	0.20	1,645.00	329.00
05/01/2024	Reginald Sainvil	Analyze notices regarding termination of account control deed.	0.30	1,195.00	358.50
05/02/2024	Maribel Fontanez	Draft agenda for May 8 hearing.	0.20	465.00	93.00
05/03/2024	Paul Keenan	Conference with senior management team and CRO regarding various issues and follow up regarding same.	0.80	1,645.00	1,316.00



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/03/2024	Paul Keenan	Correspondence regarding potential closure of bank accounts.	0.30	1,645.00	493.50
05/03/2024	Reginald Sainvil	Draft and revise motion regarding dismissal of Mercafe Vietnam chapter 11 case.	3.60	1,195.00	4,302.00
05/05/2024	Paul Keenan	Correspondence and analysis regarding motion to dismiss Vietnam holdco case.	0.50	1,645.00	822.50
05/06/2024	Lori Seavey	Review latest filings and update case WIP and calendar (1.7); emails with R. Sainvil re: same (.1); circulate latest calendar to Baker team (.1).	1.90	465.00	883.50
05/06/2024	Lori Seavey	Receive final agenda and attend to filing (.2); emails with Kroll regarding service (.1).	0.30	465.00	139.50
05/06/2024	Maribel Fontanez	Finalize and e-file amended schedules and amended SOFAs.	3.20	465.00	1,488.00
05/06/2024	Maribel Fontanez	Finalize, e-file and process for service Periodic Report 2015.3.	0.50	465.00	232.50
05/06/2024	Paul Keenan	Drafting and revising motion for dismissal of Vietnam holdco chapter 11 case.	1.30	1,645.00	2,138.50
05/06/2024	Paul Keenan	Correspondence and analysis regard MORs, SOFAs and SOLs.	0.30	1,645.00	493.50
05/06/2024	Paul Keenan	Correspondence and analysis regarding threatened closure of bank accounts.	0.30	1,645.00	493.50
05/06/2024	Paul Keenan	Conference with R. Sainvil regarding	0.20	1,645.00	329.00



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/07/2024	Lori Seavey	preparation for hearing. Research regarding amended schedules (.3); emails with R. Sainvil re same (.1).	0.40	465.00	186.00
05/07/2024	Maribel Fontanez	Finalize and e-file amended schedules and amended SOFAs.	0.10	465.00	46.50
05/07/2024	Paul Keenan	Analysis of recent financial reports.	0.20	1,645.00	329.00
05/08/2024	Lori Seavey	Review court docket and latest filings and updates to case calendar re same (.7); emails with R. Sainvil re: same (.1); emails with R. Sainvil regarding expected filings and coordination re same (.1); draft notice of amended schedules and emails with R. Sainvil re same (.2), emails with R. Sainvil re same (.1).	1.30	465.00	604.50
05/08/2024	Maribel Fontanez	Finalize and e-file motion to dismiss and motion to shorten notice; communicate with R. Sainvil regarding same.	0.60	465.00	279.00
05/08/2024	Maribel Fontanez	Prepare agenda for 05/14/2024 hearing.	0.90	465.00	418.50
05/08/2024	Paul Keenan	Correspondence regarding motion to shorten time on motion to dismiss and revising same.	0.40	1,645.00	658.00
05/08/2024	Paul Keenan	Correspondence regarding motion to dismiss case of Vietnam holdco and revising same.	0.60	1,645.00	987.00



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/08/2024	Paul Keenan	Attendance at hearing.	0.80	1,645.00	1,316.00
05/08/2024	Paul Keenan	Conference with senior management team and CRO.	1.00	1,645.00	1,645.00
05/08/2024	Reginald Sainvil	Review and revise dismissal motion, declaration and related motion to shorten notice and numerous related correspondence.	1.20	1,195.00	1,434.00
05/09/2024	Maribel Fontanez	Finalize and e-file motion to dismiss and motion to shorten notice; communicate with R. Sainvil regarding same.	0.20	465.00	93.00
05/09/2024	Paul Keenan	Correspondence and analysis regarding MORs, SOFAs and SOLs.	0.50	1,645.00	822.50
05/09/2024	Reginald Sainvil	Analyze updated SOFAs and schedules.	0.80	1,195.00	956.00
05/10/2024	Gledson Marques de Campos	Review the petition.	2.10	850.00	1,785.00
05/10/2024	Lori Seavey	Review recent filings and emails with Kroll regarding service (.2).	0.20	465.00	93.00
05/10/2024	Paul Keenan	Conference call with senior management team and RO.	0.60	1,645.00	987.00
05/10/2024	Paul Keenan	Correspondence and analysis regarding revisions to and filing of schedules, statements and MORs.	0.40	1,645.00	658.00
05/11/2024	Lori Seavey	Draft notice of hearing for Motion to Dismiss Mercafe Vietnam Ltd, emails with R. Sainvil (.3); attend to efilng and email to Kroll re: service (.2).	0.50	465.00	232.50
05/11/2024	Lori Seavey	Emails with R. Sainvil	3.50	465.00	1,627.50



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		re: January monthly operating reports for eight debtors, global notes, and attachments for same (.3); telephone call with R. Sainvil re filing, service and additional reports for remaining debtors (.1); attend to compiling monthly operating reports (2.5); emails with Kroll regarding service (.1); receive remaining debtor reports and compile and coordinate filing (.5).			
05/11/2024	Lori Seavey	Review recent filings and update case calendar with critical dates and deadlines (1.2); revisions to agenda for May 14 hearing and emails with R. Sainvil re same (.4); attend to filing agenda (.2); emails with R. Sainvil re same and emails with Kroll regarding service (.2).	2.00	465.00	930.00
05/12/2024	Lori Seavey	Attend to filing remaining monthly operating reports (.4).	0.40	465.00	186.00
05/12/2024	Paul Keenan	Correspondence and analysis in preparation for continued 341 meeting, and filing of MORs and amended statements and schedules.	0.50	1,645.00	822.50
05/13/2024	Lori Seavey	Email chambers regarding additional	0.30	465.00	139.50



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		omnibus hearing dates (.1); email updated case calendar to Baker team (.2).			
05/13/2024	Maribel Fontanez	Update amended schedules and SOFAs to include disclosure for H. Light signature.	1.30	465.00	604.50
05/13/2024	Maribel Fontanez	Review WIP/Calendar and update calendar accordingly.	0.40	465.00	186.00
05/13/2024	Maribel Fontanez	E-file schedules and SOFAs.	2.80	465.00	1,302.00
05/13/2024	Paul Keenan	Correspondence and analysis regarding amended statements.	0.40	1,645.00	658.00
05/13/2024	Paul Keenan	Conference with senior management team and CRO.	0.50	1,645.00	822.50
05/13/2024	Paul Keenan	Correspondence and conference with CRO in preparation for hearing.	0.20	1,645.00	329.00
05/13/2024	Paul Keenan	Conference with CRO in preparation for continued 341 meeting.	0.30	1,645.00	493.50
05/14/2024	Lori Seavey	Draft notice of omnibus hearings for June and July (.3); emails with R. Sainvil re same (.1); attend to filing and email to Kroll re: service (.2); update case calendar re omnibus hearings and related deadlines related to same (.6).	1.20	465.00	558.00
05/14/2024	Maribel Fontanez	Register P. Keenan and R. Sainvil for 05.15 and 05.16 hearings; arrange for conference rooms in NY for both dates.	0.20	465.00	93.00
05/14/2024	Maribel Fontanez	Prepare, finalize, e-file	0.60	465.00	279.00



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05/17/2024	Lori Seavey	and process for service agenda for 05/16 hearing; communicate with R. Sainvil regarding same. Receive transcript and circulate (.2); arrange additional orders for hearing transcripts (.2).	0.40	465.00	186.00
05/17/2024	Paul Keenan	Conference with CRO and senior management team.	0.30	1,645.00	493.50
05/17/2024	Paul Keenan	Conference with CRO regarding various matters.	0.20	1,645.00	329.00
05/20/2024	Lori Seavey	Review and update critical dates WIP for team (.4); email Baker team with redline (.1).	0.50	465.00	232.50
05/20/2024	Maribel Fontanez	Review WIP/ Calendar; update calendar accordingly.	0.40	465.00	186.00
05/21/2024	Paul Keenan	Conference with CRO regarding ESI issues under Vietnam sale, changes to DS requested by US Trustee, and numerous other issues.	0.70	1,645.00	1,151.50
05/22/2024	Paul Keenan	Brief analysis of financial reports.	0.30	1,645.00	493.50
05/22/2024	Paul Keenan	Conference with senior management team and CRO regarding numerous issues.	1.00	1,645.00	1,645.00
05/23/2024	Lori Seavey	Review recent case filings and update case calendar with relevant critical dates (.8).	0.80	465.00	372.00
05/23/2024	Paul Keenan	Numerous conferences and correspondence with R. Sainvil.	0.60	1,645.00	987.00
05/24/2024	Lori Seavey	Emails with R. Sainvil	1.10	465.00	511.50





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05/24/2024	Maribel Fontanez	(.1); draft agenda for 5/29 hearing (.7); prepare filing and attend to filing agenda and email Kroll regarding service (.3). Finalize and e-file MORs (February 2024); communicate with R. Sainvil regarding same.	2.30	465.00	1,069.50
05/24/2024	Maribel Fontanez	Retrieve, review and process for service DE 519 and DE 520.	0.20	465.00	93.00
05/24/2024	Paul Keenan	Conference with senior management team and CRO, and follow up regarding same.	0.70	1,645.00	1,151.50
05/24/2024	Paul Keenan	Analysis of financial reports.	0.20	1,645.00	329.00
05/24/2024	Reginald Sainvil	Review monthly operating reports.	0.50	1,195.00	597.50
05/28/2024	Maribel Fontanez	Register P. Keenan and R. Sainvil for 05.29.2024 hearing; communicate with P. Keenan and R. Sainvil regarding same.	0.20	465.00	93.00
05/28/2024	Paul Keenan	Brief analysis of MORs and weekly cash reports.	0.20	1,645.00	329.00
05/28/2024	Reginald Sainvil	Analyze and address issues relating to issues arising in connection with Mercon Brazil.	1.80	1,195.00	2,151.00
05/29/2024	Lori Seavey	Review latest filings and update case calendar (1.0); circulate to Baker team (.1).	1.10	465.00	511.50
05/29/2024	Maribel Fontanez	Review WIP and Calendar; update calendar accordingly.	1.40	465.00	651.00



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/29/2024	Paul Keenan	Attendance at hearing.	0.40	1,645.00	658.00
05/29/2024	Paul Keenan	Preparation for hearing with R. Sainvil.	0.40	1,645.00	658.00
05/29/2024	Paul Keenan	Multiple correspondence regarding letters to shut down BoA accounts.	0.30	1,645.00	493.50
05/29/2024	Paul Keenan	Conference with senior management team and CRO regarding various issues.	0.90	1,645.00	1,480.50
05/29/2024	Paul Keenan	Brief analysis of financial reports.	0.30	1,645.00	493.50
05/30/2024	Lori Seavey	Review latest filings and update case WIP and calendar (.4).	0.40	465.00	186.00
05/30/2024	Maribel Fontanez	Finalize and efile MORs; communicate with R. Sainvil regarding same.	0.90	465.00	418.50
05/31/2024	Maribel Fontanez	Finalize and e-file MORs.	1.20	465.00	558.00
05/31/2024	Paul Keenan	Conference with senior management team and CRO.	0.50	1,645.00	822.50
05/31/2024	Paul Keenan	Analysis of monthly operating reports.	0.30	1,645.00	493.50

**B120-Asset Analysis and Recovery**

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/01/2024	Paul Keenan	Numerous correspondence and analysis regarding potential insurance claims.	0.60	1,645.00	987.00
05/02/2024	Oanh Nguyen	Review and discuss with Tram to finalize the Pacorini termination agreement.	0.60	950.00	570.00
05/06/2024	Oanh Nguyen	Review and finalize	1.00	950.00	950.00



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		Tram's draft response regarding signing merger filing application and subsequent signing; correspond with F. Cuadra del Carmen regarding escrow account bank recommendation.			
05/12/2024	Paul Keenan	Multiple correspondence regarding recoveries on insurance policies.	0.30	1,645.00	493.50
05/13/2024	Oanh Nguyen	Discuss with Tram regarding Vietnam closing deliverables.	0.40	950.00	380.00
05/24/2024	Oanh Nguyen	Discuss with Quoc Anh of SCB regarding opening of an escrow account and underlying transaction; attend a call with a wider team regarding the same.	0.90	950.00	855.00
05/27/2024	Oanh Nguyen	Correspond with Quoc Anh of SCB regarding escrow account opening.	0.50	950.00	475.00
05/28/2024	Paul Keenan	Correspondence regarding potential recovery under various insurance policies.	0.40	1,645.00	658.00
05/29/2024	Oanh Nguyen	Review and finalize Tram's response regarding termination and compensation for employees; review and respond to Euro Pest Control regarding a notification letter regarding bankruptcy.	0.90	950.00	855.00
05/30/2024	Oanh Nguyen	Attend a call with SCB regarding escrow account opening;	0.70	950.00	665.00



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		discuss with Tram to finalize a draft email regarding the same to Federico.			
<b>B130-Asset Disposition</b>					
<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/01/2024	Federico Cuadra Del Carmen	Call with VN Purchaser and R&Co to discuss action items required for closing.	0.60	1,345.00	807.00
05/01/2024	Reginald Sainvil	Analyze assignment agreement and release of NY Security.	0.70	1,195.00	836.50
05/01/2024	Reginald Sainvil	Analyze and revise Specialty sale motion, notice and declarations.	0.80	1,195.00	956.00
05/01/2024	Thijs Bogaers	Review the status of the Assignment and Assumption Agreement, includes correspondences with Baker US Team regarding the same.	0.30	616.36	184.91
05/01/2024	Zachary Bassen	Vietnam sale - Draft and revise closing certificates and other closing documents.	1.50	750.00	1,125.00
05/02/2024	Hoang Anh Nguyen	Arrange signing process for Retention Agreement, review draft decision of BVI company regarding MSA.	0.60	480.00	288.00
05/02/2024	Lori Seavey	Draft certificate of no objection for Vietnam sale motion (.5); emails with R. Sainvil re same (.1).	0.60	465.00	279.00
05/02/2024	Lori Seavey	Receive final filings with respect to StoneX sale, review and prepare same for filing (.9); emails with R.	1.70	465.00	790.50



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05/02/2024	Paul Keenan	Sainvil re same (.1); emails with Kroll re: service (.2); receive final approved filing and attend to e-filing (.5). Numerous correspondence regarding disposition of Brazilian assets.	0.40	1,645.00	658.00
05/02/2024	Paul Keenan	Numerous correspondence and analysis regarding finalizing motion for approval of sale to StoneX and filing same.	0.80	1,645.00	1,316.00
05/02/2024	Phuoc Anh Tram Nguyen	Review and revise the Pacorini Termination Agreement as commented by the buyer.	0.50	280.00	140.00
05/02/2024	Phuoc Anh Tram Nguyen	Review the confirmation letter of Military Bank as commented by KPMG.	0.30	280.00	84.00
05/02/2024	Reginald Sainvil	Analyze and revise agenda regarding sale hearing.	0.20	1,195.00	239.00
05/02/2024	Reginald Sainvil	Analyze and revise sale motion and numerous related correspondence.	0.70	1,195.00	836.50
05/02/2024	Reginald Sainvil	Correspondence with purchaser's counsel regarding dismissal and releases in connection with Vietnam sale.	0.50	1,195.00	597.50
05/02/2024	Silvia Bernardino	Review of the discussions between Mercon and XStone regarding the	0.40	685.00	274.00



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05/02/2024	Zachary Bassen	agreements to check if changes are required. Vietnam sale - review and revise closing checklist.	0.60	750.00	450.00
05/03/2024	Grace Blackburn	Consider closing checklist outstanding matters; internal discussion regarding the same; follow-up on deliverables.	2.40	850.00	2,040.00
05/03/2024	Phuoc Anh Tram Nguyen	Discuss with Bui Thu Thuy (Mercafe Vietnam) on the confirmation letter from Military Bank (0.2); update the confirmation letter from Military Bank (0.1).	0.30	280.00	84.00
05/03/2024	Reginald Sainvil	Analyze and revise proposed sale order to address resolution of release and consent issues.	0.70	1,195.00	836.50
05/03/2024	Reginald Sainvil	Correspondence with purchaser's counsel regarding open items in connection with Specialty sale.	0.20	1,195.00	239.00
05/03/2024	Reginald Sainvil	Draft and revise motion to shorten notice in connection with dismissal motion.	0.60	1,195.00	717.00
05/03/2024	Thijs Bogaers	Review the status of the various documents we forwarded to the Vietnamese Embassy and share findings with client.	0.30	616.36	184.91
05/03/2024	Zachary Bassen	Closing checklist call with G. Blackburn and F. Cuadra del Carmen.	0.90	750.00	675.00
05/05/2024	Zachary Bassen	Draft and revise closing checklist.	0.60	750.00	450.00



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05/06/2024	Federico Cuadra Del Carmen	Call with A. Morely to discuss requests from VN Purchaser, fleshing out possible resolution strategies.	1.20	1,345.00	1,614.00
05/06/2024	Grace Blackburn	Consider closing checklist outstanding matters; internal discussion regarding the same; follow-up on deliverables.	1.70	850.00	1,445.00
05/06/2024	Jonathan Susko	Review, analyze and revise assignment and assumption agreement to reflect comments from H. Walsh; correspondence with Mercon regarding the same.	0.50	1,125.00	562.50
05/06/2024	Lori Seavey	Research precedent transcripts regarding Wiles' sale hearings (1.7); emails with R. Sainvil re same (.1); draft notice of hearing and updates to StoneX notices re same (1.2); emails with R. Sainvil regarding related deadlines (.2); emails with R. Sainvil regarding filing and service of notices (.2); attend to filing notice of hearing, notice of sale and cure notice (.6); emails with Kroll regarding service of same (.2); draft notice of filing revised proposed order in re: COCFO sale (.3); emails with R. Sainvil re same (.2); prepare filing for Cocfo Ltd	5.30	465.00	2,464.50



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05/06/2024	Paul Keenan	proposed sale order and then stand down as possible changes to come (.2); receive edit to sale order and finalize for filing (.3); email to Kroll re: service of same (.1). Drafting and revising sale order with respect to Crowd Out guaranty claims and multiple correspondence regarding same.	0.50	1,645.00	822.50
05/06/2024	Paul Keenan	Multiple correspondence regarding sale of Vietnam assets and settlement with CrowdOut.	0.20	1,645.00	329.00
05/06/2024	Phuoc Anh Tram Nguyen	Prepare an update on the Vietnamese closing deliverables to BMUS team.	0.80	280.00	224.00
05/06/2024	Phuoc Anh Tram Nguyen	Discuss with Le Tuan Minh on questions relating to the signatory of the merger filing dossier and prepare response on the same.	0.60	280.00	168.00
05/06/2024	Phuoc Anh Tram Nguyen	Check the received legalized documents of the BVI company and its notarized Vietnamese translation.	0.30	280.00	84.00
05/06/2024	Reginald Sainvil	Review and revise motion for order dismissing debtor Mercafe Vietnam.	0.70	1,195.00	836.50
05/06/2024	Reginald Sainvil	Prepare for sale hearing regarding Vietnam sale.	1.50	1,195.00	1,792.50





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05/06/2024	Reginald Sainvil	Analyze short form stock purchase agreement.	0.40	1,195.00	478.00
05/06/2024	Tuan Minh Le	Work with Nguyen Anh Tram to prepare response to follow-up questions regarding merger filing dossier and request for information.	0.70	350.00	245.00
05/06/2024	Zachary Bassen	Vietnam sale - attend to closing matters including review of documents to appoint new directors and signature coordination.	1.20	750.00	900.00
05/07/2024	Federico Cuadra Del Carmen	Tend to VN closing deliverables.	0.30	1,345.00	403.50
05/07/2024	Grace Blackburn	Review and update Assignment and Assumption Agreement and Assignment Agreement; liaise with BM Vietnam re. change in legal representatives and merger filing.	2.60	850.00	2,210.00
05/07/2024	Phuoc Anh Tram Nguyen	Work on follow up questions from BMUS team regarding the merger filing and the registration of the legal representative in Vietnam, and exchange emails on the same.	1.90	280.00	532.00
05/07/2024	Thijs Bogaers	Manage and coordinate the shipment of the documents that have been legalized up to and including the Vietnamese Embassy, includes reviewing	0.40	616.36	246.54

**Baker  
McKenzie.**

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		said documents and sharing findings it client.			
05/07/2024	Zachary Bassen	Vietnam sale - call with G. Blackburn and F. Cuadra del Carmen to discuss closing matters; review and revise closing documents.	1.40	750.00	1,050.00
05/08/2024	Grace Blackburn	Revise draft Assignment and Assumption Agreement and Assignment Agreement; attend meeting with Rothschild to discuss status and progression of deliverables; correspondence with BM Vietnam re. legal rep changes.	2.40	850.00	2,040.00
05/08/2024	Maribel Fontanez	Review and calendar notice of sale hearing.	0.20	465.00	93.00
05/08/2024	Phuoc Anh Tram Nguyen	Review and comment on questions and arrangement relating to Vietnamese closing deliverables/actions set out in email from Blackburn, Grace.	1.30	280.00	364.00
05/08/2024	Phuoc Anh Tram Nguyen	Prepare an email to update KPMG on the agreed arrangement for registration of legal representative in Vietnam and request pending information and documents of the person nominated by the Buyer to complete the registration of legal representative.	0.70	280.00	196.00
05/08/2024	Reginald Sainvil	Review signing and	0.40	1,195.00	478.00



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05/08/2024	Reginald Sainvil	closing checklist and update deadlines. Prepare for and attend hearing regarding Vietnam sale.	1.00	1,195.00	1,195.00
05/08/2024	Steven Canner	Conference call with F. Cuadra del Carmen regarding transition solution.	0.20	1,645.00	329.00
05/08/2024	Thijs Bogaers	Manage and coordinate the shipment of the various documents to be used in Vietnam, setting up a meeting with S. Stemmler (Mercon) for the purposes of executing Vietnam related transaction documents and reviewing the draft Assignment and Assumption Agreement.	0.70	616.36	431.45
05/08/2024	Zachary Bassen	US sale - review and revise closing checklist.	0.20	750.00	150.00
05/08/2024	Zachary Bassen	Vietnam sale - review and revise closing documents including closing certificates, documents to appoint new BVI director and documents for the assignment of interco receivables; review and revise checklist.	1.50	750.00	1,125.00
05/09/2024	Cecilia Reategui	Various exchanges of e-mail and coordinate for execution of documents.	2.00	455.00	910.00
05/09/2024	Grace Blackburn	Revise draft of short-form SPA; liaise with BM Vietnam re. KPMG queries.	1.80	850.00	1,530.00



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05/09/2024	Hoang Anh Nguyen	Update resolutions of BVI company regarding retention agreement, arrange for signing MSA.	0.90	480.00	432.00
05/09/2024	Jonathan Susko	Correspondence with StoneX, Mercon, P. Keenan and local counsel regarding barter contracts transfer; review and analyze checklist; correspondence with R. Sainvil re same.	0.30	1,125.00	337.50
05/09/2024	Paul Keenan	Numerous correspondence regarding sale of contracts to StoneX.	0.30	1,645.00	493.50
05/09/2024	Phuoc Anh Tram Nguyen	Research and prepare response on the questions regarding removing the Seller's bank account from the Short Form Stock Purchase Agreement.	0.80	280.00	224.00
05/09/2024	Phuoc Anh Tram Nguyen	Translate the Pacorini Termination Agreement into Vietnamese.	2.00	280.00	560.00
05/09/2024	Phuoc Anh Tram Nguyen	Clean up the Pacorini Termination Agreement and share the same to Bui Thu Thuy (Mercafe Vietnam) for further discussion with Pacorini.	0.50	280.00	140.00
05/09/2024	Phuoc Anh Tram Nguyen	Review instruction from BMUS on the signatory of the BVI company on the merger filing dossier and exchange emails on the same with KPMG.	0.40	280.00	112.00



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05/09/2024	Phuoc Anh Tram Nguyen	Review the execution version of the merger filing dossier and the signing instruction circulated by KPMG.	0.50	280.00	140.00
05/09/2024	Thijs Bogaers	Review the draft Assignment and Assumption Agreement, includes correspondence with G. Blackburn (BM NY).	0.60	616.36	369.82
05/09/2024	Zachary Bassen	USA - review and revise ancillary agreements to the APA.	0.70	750.00	525.00
05/09/2024	Zachary Bassen	Vietnam - review and revise ancillary agreements to the SPA; coordinate Vietnam merger filing and related documents.	1.50	750.00	1,125.00
05/10/2024	Cecilia Reategui	Coordinate for in person execution of documents; confirm signature of documents; coordinate shipment of documents to Vietnam.	0.70	455.00	318.50
05/10/2024	Jonathan Susko	Prepare for and participate in call with R. Sainvil regarding specialty sale and Brazil barter contracts; correspondence with Mercon and P. Keenan regarding anticipated timing and feasibility; correspondence with H. Walsh and local counsel in Brazil regarding barter contract transfer.	0.80	1,125.00	900.00
05/10/2024	Paul Keenan	Correspondence and	0.30	1,645.00	493.50



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05/10/2024	Phuoc Anh Tram Nguyen	analysis regarding sale of specialty business and assignment of Brazilian contracts. Review the Short Form Stock Purchase Agreement revised by BMUS team and circulate the same to KPMG.	0.40	280.00	112.00
05/10/2024	Phuoc Anh Tram Nguyen	Review the Short Form Stock Purchase Agreement commented and revised by KPMG (0.3); discuss and work with Dao Thanh Hoa on the requirement to include the Seller's bank account from tax perspective (0.2); prepare response to KPMG on the same (0.2).	0.70	280.00	196.00
05/10/2024	Phuoc Anh Tram Nguyen	Prepare response to questions regarding signing of the merger filing dossier from Bassen, Zach.	0.30	280.00	84.00
05/10/2024	Phuoc Anh Tram Nguyen	Review the irrevocable letters of authorization updated by KPMG (0.2); prepare Vietnamese translation of such letters of authorization and revise the termination date (0.9).	1.10	280.00	308.00
05/10/2024	Phuoc Anh Tram Nguyen	Review email from Anh Luong (KPMG) on the Vietnamese closing deliverables and arrangement for registration of the	1.90	280.00	532.00



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		legal representative (0.5); discuss with Nguyen Trung Nguyen, Phan Tran Yen Trang and Oanh Nguyen on the arrangement for registration of the legal representative proposed by KPMG (0.5); prepare response to KPMG (0.9).			
05/10/2024	Reginald Sainvil	Analyze and revise assignment and assumption agreements related to Vietnam sale.	0.40	1,195.00	478.00
05/10/2024	Reginald Sainvil	Telephone conference regarding potential issues arising in connection with Specialty sale.	0.50	1,195.00	597.50
05/10/2024	Thi Thanh Hoa Dao	Review the questions and KPMG's comments regarding the necessity of providing seller's bank account information in SPA (email dated 10 May of AT.Nguyen). Respond to the same. Review and confirm the draft response to KMPG prepared by AT.Nguyen.	0.50	520.00	260.00
05/10/2024	Thijs Bogaers	Review, edit and circulate the draft Assignment and Assumption Agreement and the Assignment Agreement to Resor Team.	0.90	616.36	554.72
05/10/2024	Zachary Bassen	USA Sale - review and revise assignment	1.60	750.00	1,200.00



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05/10/2024	Zachary Bassen	agreement, bill of sale and officer certificates. Vietnam sale - Review and revise closing checklist.	0.20	750.00	150.00
05/11/2024	Paul Keenan	Multiple correspondence regarding assignment of contracts I Brazil and sale of specialty coffee business.	0.40	1,645.00	658.00
05/12/2024	Paul Keenan	Correspondence and analysis regarding assets sales, including Vietnam business, specialty business and Brazilian contracts.	0.70	1,645.00	1,151.50
05/12/2024	Zachary Bassen	Vietnam sale - coordinate execution of MSA and merger filing and delivery of documents to Vietnam.	0.20	750.00	150.00
05/13/2024	Federico Cuadra Del Carmen	Closing checklist call.	0.30	1,345.00	403.50
05/13/2024	Grace Blackburn	Discuss updated proposal from KPMG and prepare response on the same; review revised ancillary documents from DPW and provide comments on the same; assess BVI entity articles of association for director authorities; review SPA for notification obligations of certain matters.	2.00	850.00	1,700.00
05/13/2024	Paul Keenan	Correspondence and analysis regarding various asset sale and dismissal of Vietnam holdco case.	0.30	1,645.00	493.50
05/13/2024	Phuoc Anh Tram	Discuss with Anh	0.30	280.00	84.00





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	Nguyen	Luong (KPMG) on the arrangement for registration of the legal representative.			
05/13/2024	Phuoc Anh Tram Nguyen	Review comments from KPMG on the Short Form Stock Purchase Agreement and arrangement of registration of the legal representative, and prepare responses to the same.	0.80	280.00	224.00
05/13/2024	Phuoc Anh Tram Nguyen	Prepare a fresh email setting out the status of the Vietnamese closing deliverables, KPMG's proposal and any questions or challenges for sending to BM US team.	1.30	280.00	364.00
05/13/2024	Zachary Bassen	Brazil - Finalize consents and prepare signature pages.	0.60	750.00	450.00
05/13/2024	Zachary Bassen	Vietnam - Review and revise closing checklist, review and revise closing documents, prepare closing signature packets.	3.00	750.00	2,250.00
05/14/2024	Grace Blackburn	Draft response to Rothschild; liaise re. Pacorini agreement.	0.60	850.00	510.00
05/14/2024	Jonathan Susko	Correspondence and calls with R. Sainvil and Z. Bassen regarding the Brazil barter contract transfer.	0.20	1,125.00	225.00
05/14/2024	Phuoc Anh Tram Nguyen	Discuss and exchange emails with BM US team on the position of updating the Short	0.40	280.00	112.00



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05/14/2024	Phuoc Anh Tram Nguyen	Form Stock Purchase Agreement. Respond to questions from Cuadra Del Carmen, Federico regarding the arrangement for registration of the new legal representative.	0.40	280.00	112.00
05/14/2024	Phuoc Anh Tram Nguyen	Discuss with Anh Luong (KPMG) on the arrangement for registration of the new legal representative of the Vietnamese companies.	0.30	280.00	84.00
05/14/2024	Phuoc Anh Tram Nguyen	Review comments from BM US team on the Vietnamese closing deliverables and prepare an email to KPMG on the same.	0.80	280.00	224.00
05/14/2024	Thijs Bogaers	Correspondences with client regarding the execution of the Vietnamese transaction documents, includes call with J. Posthumus (BM Amsterdam) regarding the same (0.4); Correspondence with BM US Team regarding the signing instructions of the Dutch law governed Assignment Agreements (0.3).	0.70	616.36	431.45
05/14/2024	Zachary Bassen	Finalize documentation for Brazil sale and coordinate signature.	0.80	750.00	600.00
05/14/2024	Zachary Bassen	Review and revise closing documents;	1.40	750.00	1,050.00



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05/15/2024	Cecilia Reategui	prepare closing signature packets. Internal communication with Z. Bassen on documents for execution in person; print and coordination of documents for in-person execution.	2.00	455.00	910.00
05/15/2024	Federico Cuadra Del Carmen	Analyze updated closing docs provided by Z. Bassen.	0.20	1,345.00	269.00
05/15/2024	Grace Blackburn	Correspondence with BM ViN to progress closing deliverables; review documentation and signing requirements; preparing signing instructions; draft side letter to the SPA to reflect commercial agreements re. Director appointment costs and liabilities, consider necessary updates to Purchase Agreement.	4.30	850.00	3,655.00
05/15/2024	Jonathan Susko	Correspondence and calls with StoneX regarding signing.	0.40	1,125.00	450.00
05/15/2024	Phuoc Anh Tram Nguyen	Discuss with BM US team on the potential revisions in the Short Form Stock Purchase Agreement.	0.30	280.00	84.00
05/15/2024	Phuoc Anh Tram Nguyen	Review comments from KPMG on the Vietnam closing deliverables and the updated irrevocable letters of authorization (0.5); discuss with and seek comments from	1.40	280.00	392.00



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05/15/2024	Phuoc Anh Tram Nguyen	Dao Thanh Hoa on the comments from KPMG on the tax perspective (0.2); prepare and exchange email to KPMG on the same (0.7). Advise the signing formalities for the Vietnamese law governed documents and other closing documents from a Vietnamese perspective.	0.60	280.00	168.00
05/15/2024	Phuoc Anh Tram Nguyen	Discuss and exchange emails with Luu Quang Anh (KPMG) on the status of the merger filing dossier and the signing authority of the director of the BVI company.	0.60	280.00	168.00
05/15/2024	Phuoc Anh Tram Nguyen	Discuss with Bui Thu Thuy (Mercafe Vietnam) on the arrangement for signatures of the Vietnamese closing deliverables and documents for registration of the legal representative.	0.30	280.00	84.00
05/15/2024	Phuoc Anh Tram Nguyen	Review the execution version of the dossier for registration of the legal representative and its signing instruction prepared by KPMG (0.6); discuss with Anh Luong (KPMG) on further updates to such signing instruction	1.50	280.00	420.00



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		(0.3); extract the documents to be signed by the directors of the BVI company and its signing instructions and circulate the same to BM US team (0.4); respond to instructions from BM US team on the arrangement of signing of the documents at the Vietnam level (0.2).			
05/15/2024	Thi Thanh Hoa Dao	Review KPMG's comments regarding the mention of seller's bank account in the SPA. Correspond the requirement of Vietnamese law regarding the same with AT.Nguyen.	0.40	520.00	208.00
05/15/2024	Zachary Bassen	StoneX sales - Finalize Brazilian assignment and assumption agreement; review StoneX APA for provisions which may affect ability to sell date to Sucafina.	1.00	750.00	750.00
05/15/2024	Zachary Bassen	Vietnam sale - review and revise closing documents; draft side letter to the SPA; coordinate signatures for all closing documents.	3.20	750.00	2,400.00
05/16/2024	Cecilia Reategui	Coordinate signature by client; scan documents and coordinate shipment to Vietnam.	2.00	455.00	910.00
05/16/2024	Federico Cuadra	Review draft Side	0.30	1,345.00	403.50



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	Del Carmen	Letter Agreement to the SPA.			
05/16/2024	Grace Blackburn	Liaise with counterparts to closing deliverables for signatures and finalizing the same; review short-form purchase agreement and mark-up the same.	2.30	850.00	1,955.00
05/16/2024	Phuoc Anh Tram Nguyen	Prepare an email to Bui Thu Thuy (Mercafe Vietnam) on the documents that need signature of Biju Nair and the signing instruction of such documents (0.9); discuss with Bui Thu Thuy (Mercafe Vietnam) on the same (0.4).	1.30	280.00	364.00
05/16/2024	Phuoc Anh Tram Nguyen	Respond to questions from BM US team on other documents which need to be signed by Luis and Duncan.	0.30	280.00	84.00
05/16/2024	Phuoc Anh Tram Nguyen	Review and revise the Short Form Stock Purchase Agreement circulated by KPMG (0.7); seek comments from Dao Thanh Hoa on the same (0.2); clean up the revisions in the Short Form Stock Purchase Agreement and share the same to BM US team (0.2).	1.10	280.00	308.00
05/16/2024	Phuoc Anh Tram Nguyen	Extract the signature page of Mercon BV to the Short Form Stock Purchase Agreement.	0.20	280.00	56.00



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05/16/2024	Phuoc Anh Tram Nguyen	Prepare response to questions from Cuadra Del Carmen, Federico regarding the acknowledgement of Mercon BV on the Short Form Stock Purchase Agreement.	0.40	280.00	112.00
05/16/2024	Thi Thanh Hoa Dao	Review KPMG's updates to clauses 3.4 and 3.5 of the SPA (email dated 16 May of AT.Nguyen). Revise the same.	0.30	520.00	156.00
05/16/2024	Thijs Bogaers	Correspondences with J. Posthumus (BM Amsterdam) regarding the current status of the Vietnamese documents signed by the sole managing director of Mercon B. V.	0.30	616.36	184.91
05/16/2024	Zachary Bassen	Vietnam sale - review and revise closing documents; coordinate closing signatures and attend to other closing matters.	1.80	750.00	1,350.00
05/17/2024	Federico Cuadra Del Carmen	(0.4) Call with A. Morley and G. Blackburn to discuss status of VN closing deliverables;	0.40	1,345.00	538.00
05/17/2024	Grace Blackburn	Call with Rothschild to confirm status of closing deliverables; discuss status of court approvals with BM Bankruptcy.	0.70	850.00	595.00
05/17/2024	Jonathan Susko	Review and analyze specialty APA and question from Rothschild; correspondence with	0.40	1,125.00	450.00



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05/17/2024	Phuoc Anh Tram Nguyen	F. Cuadra Del Carmen regarding the same. Review comments of BM US team on the Short Form Stock Purchase Agreement and update the Short Form Stock Purchase Agreement accordingly (0.4); seek comments from Dao Thanh Hoa on the same (0.2); clean up the updated Short Form Stock Purchase Agreement and share the same with KPMG (0.2).	0.80	280.00	224.00
05/17/2024	Phuoc Anh Tram Nguyen	Discuss with Anh Luong (KPMG) on the stamping of the dossier for legal representative registration (0.2); arrange and coordinate on the same with Bui Thu Thuy (Mercafe Vietnam) and Anh Luong (KPMG) (0.4).	0.60	280.00	168.00
05/17/2024	Thi Thanh Hoa Dao	Review BM US team' updates to clauses 3.4 and 3.5 of the SPA (email dated 17 May of AT.Nguyen). Revise the same.	0.20	520.00	104.00
05/17/2024	Thijs Bogaers	Review and analyze the input received from Resor Team on the draft Assignment Agreements (0.2); correspondences with client regarding the current status of the Vietnamese documents (0.2).	0.40	616.36	246.54





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05/17/2024	Zachary Bassen	Vietnam sale - review side letter to SPA; review and revise closing checklist.	0.30	750.00	225.00
05/20/2024	Federico Cuadra Del Carmen	Review draft closing deliverables for US asset sale provided by Z. Bassen.	0.30	1,345.00	403.50
05/20/2024	Grace Blackburn	Call with Rothschild to confirm position with respect to insurance policies; calls with DPW to discuss closing deliverables, including assignment agreements and short-form SPAs.	0.80	850.00	680.00
05/20/2024	Jonathan Susko	Call with F. Cuadra Del Carmen and A. Morley regarding potential sale of CRM; review, analyze and revise ancillaries; correspondence with Z. Bassen regarding the same.	0.60	1,125.00	675.00
05/20/2024	Reginald Sainvil	Review revised short form SPA.	0.30	1,195.00	358.50
05/20/2024	Thijs Bogaers	Review, edit and circulate the draft Assignment Agreements to Baker Team and Resor Team.	0.40	616.36	246.54
05/20/2024	Zachary Bassen	Vietnam sale - review and revise closing documents.	0.30	750.00	225.00
05/20/2024	Zachary Bassen	USA sale - review and revise closing documents; prepare closing signature packet.	0.50	750.00	375.00
05/21/2024	Federico Cuadra Del Carmen	Call re: VN Purchaser requests with A.	0.50	1,345.00	672.50



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05/21/2024	Grace Blackburn	Morley and H. Light; Draft proposed terms for License & Use Agreement. Liaise with BM VN re. deliverables; call with Rothschild to confirm status of closing deliverables; discuss status of court approvals with BM Bankruptcy	0.50	850.00	425.00
05/21/2024	Paul Keenan	Conference with F. Cuadra regarding ESI issues under Vietnam sale.	0.30	1,645.00	493.50
05/21/2024	Phuoc Anh Tram Nguyen	Arrange with Bui Thu Thuy (Mercafe Vietnam) for affixing the corporate seals on the Mutual Separation Agreement.	0.30	280.00	84.00
05/21/2024	Thijs Bogaers	Manage and coordinate the legalization of the various documents required to implement Project Mocha up to and including the Vietnamese Embassy, includes multiple correspondences with Client and Baker Amsterdam Team regarding the same.	0.70	616.36	431.45
05/21/2024	Zachary Bassen	Vietnam sale - coordinate appointment of director to the BVI entity; attend to closing matters.	0.40	750.00	300.00
05/22/2024	Grace Blackburn	Call with DPW to progress deliverables.	0.20	850.00	170.00
05/22/2024	Hoang Anh Nguyen	Prepare documentation	3.50	480.00	1,680.00



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		regarding termination with Director of Vietnam entities, confer with him on the same and answer relevant questions, arrange for execution of the documents, prepare acknowledgment of receipt for handover of originals of the documentation, report to team on status of the case and next steps.			
05/22/2024	Paul Keenan	Brief analysis of objection to StoneX sale.	0.30	1,645.00	493.50
05/22/2024	Paul Keenan	Correspondence regarding issues related to sale of Vietnam assets.	0.30	1,645.00	493.50
05/22/2024	Phuoc Anh Tram Nguyen	Respond to follow up questions from BM US team regarding the Termination Agreement signed by Pacorini.	0.30	280.00	84.00
05/22/2024	Phuoc Anh Tram Nguyen	Meet with Bui Thu Thuy (Mercafe Vietnam) to receive and check the documents of the Vietnamese companies.	0.50	280.00	140.00
05/22/2024	Phuoc Anh Tram Nguyen	Review the Termination Agreement signed by Pacorini and provide comments on the same.	0.70	280.00	196.00
05/22/2024	Thijs Bogaers	Working session with M. Fong-Akan (BM Amsterdam) regarding	0.30	616.36	184.91



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05/22/2024	Zachary Bassen	the legalization of the various Project Mocha documents up to and including the Embassy of Vietnam. Attend to closing matters for USA, Brazil and Vietnam sales including reviewing and revising closing documents, coordinating signatures, and liaising with local counsels.	2.30	750.00	1,725.00
05/23/2024	Maribel Fontanez	Review StoneX sale motion and additional contracts; communicate with R. Sainvil regarding how to proceed with same.	0.60	465.00	279.00
05/23/2024	Phuoc Anh Tram Nguyen	Respond to follow up questions from Blackburn, Grace regarding the Termination Agreement signed by Pacorini (0.7); follow up with KPMG on the comments on the Vietnamese translation of the Termination Agreement (0.2); exchange emails with Henry Walsh on re-execution of the Termination Agreement (0.5).	1.40	280.00	392.00
05/23/2024	Phuoc Anh Tram Nguyen	Prepare the delivery note and arrange for delivery of the Irrevocable Letters of Authorization to the buyer for counter-signing.	0.30	280.00	84.00
05/23/2024	Reginald Sainvil	Analyze revised	0.70	1,195.00	836.50



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05/23/2024	Reginald Sainvil	assignment agreements and determine sufficiency of release language. Analyze barter contracts and develop procedure to effectuate transfer.	2.70	1,195.00	3,226.50
05/23/2024	Reginald Sainvil	Prepare analysis regarding sale objection.	1.80	1,195.00	2,151.00
05/23/2024	Thijs Bogaers	Review the input received from DPW on the draft Project Mocha Assignment Agreements and share findings with Baker Team.	0.80	616.36	493.09
05/23/2024	Zachary Bassen	Attend to closing matters for Vietnam, USA and Brazil sales.	0.90	750.00	675.00
05/24/2024	Federico Cuadra Del Carmen	(0.6) Review draft closing deliverables for VN asset sale provided by Z. Bassen and G. Blackburn; (0.5) Closing checklist call with DPW; (0.3) Call re Escrow Fund establishment for VN closing.	1.40	1,345.00	1,883.00
05/24/2024	Grace Blackburn	Review and revise draft of side letter; closing checklist call.	2.10	850.00	1,785.00
05/24/2024	Hoang Anh Nguyen	Provide comments on payment of termination package to Director of Vietnam entities.	1.20	480.00	576.00
05/24/2024	Paul Keenan	Multiple correspondence regarding issues arising under Vietnam sale.	0.40	1,645.00	658.00
05/24/2024	Paul Keenan	Analysis of sale	0.30	1,645.00	493.50



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05/24/2024	Paul Keenan	objection and correspondence regarding same. Multiple correspondence regarding guaranty claims and liens as they relate to asset sales.	0.30	1,645.00	493.50
05/24/2024	Phuoc Anh Tram Nguyen	Prepare a summary and extract the key terms of the escrow arrangement for sending to Siam Bank.	0.70	280.00	196.00
05/24/2024	Phuoc Anh Tram Nguyen	Discuss with the team on the escrow arrangement for paying the termination package to the legal representative of the VN companies (0.3); prepare a summary of the same for Oanh Nguyen's review (0.6); attend a call with Siam Bank on the opening of the escrow account (0.8).	1.70	280.00	476.00
05/24/2024	Reginald Sainvil	Begin preparing response to sale objection.	1.90	1,195.00	2,270.50
05/24/2024	Reginald Sainvil	Develop outline for potential resolution of sale objection.	0.50	1,195.00	597.50
05/24/2024	Reginald Sainvil	Review Vietnam closing checklist.	0.20	1,195.00	239.00
05/24/2024	Zachary Bassen	Attend to closing matters for USA, Vietnam and Brazil including checklist call, review and revise resignation letters and call with R. Sainvil to discuss objection filed to USA sale.	2.40	750.00	1,800.00



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05/25/2024	Paul Keenan	Numerous correspondence regarding resolution of issues arising in Vietnam sales.	0.30	1,645.00	493.50
05/25/2024	Phuoc Anh Tram Nguyen	Prepare response to comments from Cuadra Del Carmen, Federico regarding the escrow arrangement.	0.90	280.00	252.00
05/25/2024	Thijs Bogaers	Review, edit and circulate the draft Assignment Agreements, includes correspondences with Baker Team regarding the same.	1.20	616.36	739.63
05/26/2024	Grace Blackburn	Review and revise side letter; liaise with Bankruptcy team re. guarantees	1.70	850.00	1,445.00
05/26/2024	Reginald Sainvil	Analyze limited sale objection and develop and incorporate potential resolution into proposed sale order.	1.60	1,195.00	1,912.00
05/26/2024	Reginald Sainvil	Analyze guarantee release agreements and assess attendant risks.	1.30	1,195.00	1,553.50
05/26/2024	Zachary Bassen	Review and revise resignation letter for Vietnam sale.	0.20	750.00	150.00
05/27/2024	Grace Blackburn	Review updates to assumption agreement and side letter and finalize the same.	0.50	850.00	425.00
05/27/2024	Paul Keenan	Numerous correspondence and analysis regarding issues in closing sale of Vietnam business.	0.50	1,645.00	822.50
05/27/2024	Phuoc Anh Tram Nguyen	Prepare a draft email on the escrow	0.70	280.00	196.00



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05/27/2024	Thijs Bogaers	arrangement for further sending to the escrow bank. Review the queries related to the execution of the Mercon Settlement Agreements by the sole director of Mercon B.V.	0.40	616.36	246.54
05/27/2024	Zachary Bassen	Coordinate collection of closing signatures for Vietnam sale.	0.40	750.00	300.00
05/28/2024	Grace Blackburn	Review Side Letter and finalize comments on the same; checklist run-through call; progress deliverables.	1.50	850.00	1,275.00
05/28/2024	Lori Seavey	Telephone call with R. Sainvil regarding supplemental contract assumption list (.1); draft notice of filing for same (.9).	1.00	465.00	465.00
05/28/2024	Maribel Fontanez	Prepare supplemental cure notice; finalize, e-file and process for service supplement cure notice, notice of filing revised proposed order and amended agenda.	2.00	465.00	930.00
05/28/2024	Maribel Fontanez	Prepare notice of filing revised proposed order with regarding to StoneX; communicate with R. Sainvil regarding same.	0.30	465.00	139.50
05/28/2024	Paul Keenan	Conference with R. Sainvil regarding resolution of objection to sale motion.	0.20	1,645.00	329.00
05/28/2024	Paul Keenan	Correspondence and analysis regarding	0.30	1,645.00	493.50





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05/28/2024	Paul Keenan	resolution of sale objection. Preparation for sale hearing.	0.40	1,645.00	658.00
05/28/2024	Paul Keenan	Numerous correspondence regarding issues in closing sale of Vietnam business.	0.40	1,645.00	658.00
05/28/2024	Phuoc Anh Tram Nguyen	Update to BM US team on the status of the dossier for change of legal representative signed by the buyer's representative.	0.30	280.00	84.00
05/28/2024	Reginald Sainvil	Analyze insurance policy regarding the inventory being sold.	2.30	1,195.00	2,748.50
05/28/2024	Reginald Sainvil	Develop and negotiate resolution of limited objection to StoneX sale.	1.60	1,195.00	1,912.00
05/28/2024	Thijs Bogaers	Review, edit and circulate the draft Assignment Agreements to Resort Team and Baker US Team (0.9); working session with Baker Team regarding the legalization up to and including the Vietnamese Embassy (0.3); Review the draft Settlement Agreement and the consequences of the sole managing director of mercon B. V. signing said documents, includes sharing findings with Baker US Team (1.6).	2.80	616.36	1,725.81
05/28/2024	Zachary Bassen	Attend to closing matters for USA, Brazil and Vietnam	2.70	750.00	2,025.00



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		sales including coordinating signature pages, reviewing and finalizing closing documents and other matters.			
05/29/2024	Federico Cuadra Del Carmen	(1.2) Analyze draft closing documents prepared by Z. Bassen, drafting updates as required.	1.20	1,345.00	1,614.00
05/29/2024	Grace Blackburn	Facilitating closing of transaction; liaise with DPW and BM VN.	0.90	850.00	765.00
05/29/2024	Hoang Anh Nguyen	Prepare information on request for termination package, respond to question on potential implications from increase of termination payment amount.	0.60	480.00	288.00
05/29/2024	Jonathan Susko	Correspondence and calls with Z. Bassen regarding specialty sale and Brazil barter contract closings.	0.50	1,125.00	562.50
05/29/2024	Paul Keenan	Correspondence and analysis regarding disposition of Brazilian assets.	0.40	1,645.00	658.00
05/29/2024	Phuoc Anh Tram Nguyen	Review comments from Nguyen Hoang Anh on the larger termination package requested by the employees and revise such comments into an email response for Oanh Nguyen's review.	0.50	280.00	140.00
05/29/2024	Phuoc Anh Tram Nguyen	Follow up with Pacorini on the execution of the	0.50	280.00	140.00



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05/29/2024	Phuoc Anh Tram Nguyen	Termination Agreement. Prepare response to questions in an email from Bassen, Zach regarding the closing deliverables (0.6); discuss with KPMG team on the status of the merger filing dossier and dossier for registration of the new legal representative (0.7).	1.30	280.00	364.00
05/29/2024	Phuoc Anh Tram Nguyen	Discuss with Bui Thu Thuy (Mercafe Vietnam) on the status of the execution of the confirmation letter from the Military Bank.	0.20	280.00	56.00
05/29/2024	Reginald Sainvil	Prepare for and attend sale hearing.	1.10	1,195.00	1,314.50
05/29/2024	Thijs Bogaers	Review the current status of the Assignment Agreements and the corporate approvals related thereto, includes sharing findings with Baker US Team (0.4); Call with F. Cuadra Del Carmen (BM US) regarding the execution of the Mercon B.V) Settlement Agreement (0.3); correspondences with Baker Amsterdam Team regarding the Vietnamese legalizations, includes	0.90	616.36	554.72



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05/29/2024	Zachary Bassen	sharing findings with client (0.2). Attend to closing matters relating to the Vietnam, USA and Brazil sales including reviewing and revising closing documents, coordinating with local counsels and preparing closing signature packets.	4.70	750.00	3,525.00
05/30/2024	Federico Cuadra Del Carmen	(2) Call with R&Co, BM and Riveron Teams to discuss proposed purchase price adjustments from Purchaser; Call with Mercon Specialty Deal Team to discuss remaining action items required for closing; (0.4) Closing Checklist Call with Purchaser Counsel.	2.40	1,345.00	3,228.00
05/30/2024	Grace Blackburn	Review reps and warranties and mark-up the same; closing agenda call; finalize matters for closing.	2.40	850.00	2,040.00
05/30/2024	Paul Keenan	Numerous correspondence regarding closing on sale of Vietnam business.	0.40	1,645.00	658.00
05/30/2024	Paul Keenan	Numerous correspondence closing on asset sales and bankruptcy requirements.	0.50	1,645.00	822.50
05/30/2024	Phuoc Anh Tram Nguyen	Discuss with BM US team on the buyer's request of handover of the chops and tax tokens of the	1.00	280.00	280.00



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		Vietnamese companies and the use of the signature page of MCF for the split Assignment and Assumption Agreements (0.4); exchange emails with KPMG team on the split Assignment and Assumption Agreements and its submission requirement (0.6).			
05/30/2024	Phuoc Anh Tram Nguyen	Discuss with Bui Thu Thuy on the execution of the confirmation letter from the Military Bank and update the status to BM US team.	0.40	280.00	112.00
05/30/2024	Phuoc Anh Tram Nguyen	Prepare response to questions in an email from Cuadra Del Carmen, F. regarding the handover of the chops and tax tokens of the Vietnamese entities.	0.50	280.00	140.00
05/30/2024	Phuoc Anh Tram Nguyen	Arrange the closing deliverables and process with Bui Thu Thuy (Mercafe Vietnam) and Anh Luong (KPMG) (0.9); coordinate with the parties on the same (0.3).	1.20	280.00	336.00
05/30/2024	Phuoc Anh Tram Nguyen	Exchange emails with BM US team on the arrangement of the closing deliverables and process for handling over the chops and tax tokens	0.40	280.00	112.00



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/30/2024	Phuoc Anh Tram Nguyen	of the Vietnamese companies. Attend a call with escrow bank on the opening of the escrow account by Mercon BV (0.3); discuss with Oanh Nguyen on the concerns of the escrow bank and solutions (0.5); prepare a summary and pending points for BM US team's consideration (0.8).	1.60	280.00	448.00
05/30/2024	Thijs Bogaers	Review, edit and circulate the draft Assignment Agreements, includes multiple correspondences with Baker Team and Resor Team regarding the same.	1.80	616.36	1,109.45
05/30/2024	Zachary Bassen	Attend to closing matters regarding the USA, Vietnam and Brazil sales including attending closing checklist calls to finalize deliverables, review and revise closing deliverables, coordinate execution or closing documents and other closing matters.	4.70	750.00	3,525.00
05/31/2024	Federico Cuadra Del Carmen	(1.2)Closing checklist status call with Purchaser Deal Team; Tend to Specialty Closing; Tend to VN closing preparations.	4.00	1,345.00	5,380.00
05/31/2024	Grace Blackburn	Reviewing signature pages and funds flow	0.80	850.00	680.00



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05/31/2024	Phuoc Anh Tram Nguyen	and preparing for closing of transaction. Review the confirmation letter signed by the Military Bank and the true copy of the letter of authorization and letter of appointment certified by Military Bank (0.2); send the same to Anh Luong (KPMG) (0.2).	0.40	280.00	112.00
05/31/2024	Phuoc Anh Tram Nguyen	Discuss with Anh Luong (KPMG) on the requirement of the original of the Assignment and Assumption Agreements.	0.30	280.00	84.00
05/31/2024	Phuoc Anh Tram Nguyen	Extract the signature page of MCF to the split Assignment and Assumption Agreement and request for execution of the same (0.3); coordinate and arrange with Bui Thu Thuy (Mercafe Vietnam) on such execution (0.2).	0.50	280.00	140.00
05/31/2024	Phuoc Anh Tram Nguyen	Discuss with BM US team on the handover of the chops and tax tokens of the Vietnamese entities and arrange the same with the buyer and the Vietnamese entities.	0.70	280.00	196.00
05/31/2024	Phuoc Anh Tram Nguyen	Discuss with KPMG and the buyer on the requirement of the original of the Assignment and Assumption	0.60	280.00	168.00



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05/31/2024	Phuoc Anh Tram Nguyen	Agreement for closing purpose. Discuss with Bui Thu Thuy (Mercafe Vietnam) on the execution status of the confirmation letter from the Military Bank (0.3); review the letter of authorization and letter of appointment of the signatory of the Military Bank (0.5); discuss and confirm the execution approach of the confirmation letter with KPMG (0.4).	1.20	280.00	336.00
05/31/2024	Phuoc Anh Tram Nguyen	Prepare the delivery note and arrange for handover of the original dossier for registration of the new legal representative to KPMG.	0.60	280.00	168.00
05/31/2024	Phuoc Anh Tram Nguyen	Discuss with Bui Thu Thuy (Mercafe Vietnam) and Anh Luong (KPMG) on the confirmation of financial support of the BVI company (0.2), and exchange emails on the same with BM US team (0.2).	0.40	280.00	112.00
05/31/2024	Thijs Bogaers	Review, edit and circulate the draft Assignment Agreements, includes multiple correspondences with Baker Team and Resor Team and a call with	2.70	616.36	1,664.17





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05/31/2024	Zachary Bassen	K. Hoogenboezem (Resor) regarding the same. . Finalize documentation and coordinate closing of the sale of US assets to StoneX (2.8); attend to closing matters for the Vietnam sale including reviewing and revising documents (1.0) negotiating intercompany agreements with opposing counsel and RaboBank (1.0), reviewing and revising the final flow of funds (1.0) and attending to other closing matters (1.0).	6.80	750.00	5,100.00

**B140-Relief from Stay/Adequate Protection**

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/23/2024	Reginald Sainvil	Analyze stay relief motion filed by certain insurers.	1.40	1,195.00	1,673.00

**B150-Meetings of and Communications with Creditors**

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/07/2024	Paul Keenan	Responding to inquiry from creditor in Nicaragua.	0.20	1,645.00	329.00
05/08/2024	Paul Keenan	Responding to creditor inquiry from Nicaragua.	0.20	1,645.00	329.00
05/10/2024	Paul Keenan	Weekly conference call with counsel for UCC and follow up regarding same.	0.40	1,645.00	658.00
05/12/2024	Paul Keenan	Multiple correspondence in	0.30	1,645.00	493.50



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/13/2024	Paul Keenan	response to creditor inquiries. Attendance at continued 341 meeting.	0.50	1,645.00	822.50
05/28/2024	Paul Keenan	Appearance at continued 341 meeting.	0.20	1,645.00	329.00
05/30/2024	Paul Keenan	Conference with counsel for UCC.	0.40	1,645.00	658.00

**B160-Fee/Employment Applications**

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/01/2024	Lori Seavey	Receive quarterly OCP report and exhibit, compile for filing (.2); attend to filing report (.2).	0.40	465.00	186.00
05/01/2024	Maribel Fontanez	Prepare RESOR fee application.	2.50	465.00	1,162.50
05/01/2024	Maribel Fontanez	Recalculate amounts due to RESOR in euros; communicate with R. Sainvil regarding same.	1.60	465.00	744.00
05/01/2024	Maribel Fontanez	Continue working on Baker McKenzie first interim fee application (2.1); prepare Rothschild first interim fee application (2.0).	4.10	465.00	1,906.50
05/01/2024	Reginald Sainvil	Correspondence regarding retention of ordinary course professionals.	0.50	1,195.00	597.50
05/01/2024	Reginald Sainvil	Analyze and revise RESOR fee statement .	0.50	1,195.00	597.50
05/02/2024	Maribel Fontanez	Work on Riveron first interim fee application.	2.10	465.00	976.50
05/03/2024	Reginald Sainvil	Preparation of Baker McKenzie interim fee application.	0.80	1,195.00	956.00



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/06/2024	Maribel Fontanez	Review exhibits to Riveron first interim fee application; communicate with R. Sainvil regarding same.	1.40	465.00	651.00
05/07/2024	Maribel Fontanez	Work on Baker first interim fee application.	3.20	465.00	1,488.00
05/07/2024	Maribel Fontanez	Review Rothschild's fourth monthly fee statement; communicate with R. Sainvil regarding same.	0.20	465.00	93.00
05/07/2024	Maribel Fontanez	Work on Baker monthly fee statement, finalize, e-file and process for service.	4.70	465.00	2,185.50
05/08/2024	Maribel Fontanez	Work on Baker first interim fee application.	5.80	465.00	2,697.00
05/08/2024	Maribel Fontanez	Work on Baker first interim fee application.	1.20	465.00	558.00
05/09/2024	Reginald Sainvil	Analyze and revise Baker McKenzie and Riveron interim fee applications.	0.90	1,195.00	1,075.50
05/13/2024	Mariana Conrado	Review the emails sent by B&M team on the engagement letter signed by Demarest and by Vinicius.	0.20	545.00	109.00
05/13/2024	Maribel Fontanez	Update Riveron fee application.	0.40	465.00	186.00
05/14/2024	Mariana Conrado	Conference with Demarest and Vinicius Barquette to request their engagement letters to work on the case; review the status of the case to verify possible measures to be taken on it.	0.40	545.00	218.00



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05/14/2024	Maribel Fontanez	Finalize Riveron first interim fee application; communicate with R. Sainvil regarding same.	0.80	465.00	372.00
05/14/2024	Maribel Fontanez	Finalize exhibits to Baker fee application; communicate with L. Seavey regarding same.	0.60	465.00	279.00
05/14/2024	Maribel Fontanez	Finalize, e-file and process for service Rothschild Fifth Monthly Fee Statement.	0.30	465.00	139.50
05/15/2024	Lori Seavey	Review emails regarding Baker first interim fee application (.2); review draft Baker first interim fee application for filing (1.1); emails with P. Keenan and accounting personnel re same (.4); revisions to application (.4); Receive Riveron first interim fee application and review for filing (.4); additional revisions to Baker interim application (.3); attend to filing Baker and Riveron fee applications (.7); email to Kroll regarding service (.1).	3.60	465.00	1,674.00
05/16/2024	Mariana Conrado	Exchange emails with Demarest team to request again its engagement letter; exchange emails with B&M team to understand the date	0.30	545.00	163.50



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		that should be appointed in the engagement letter and address it to Demarest team; exchange emails with B&M team to send to them the engagement letter received form Demarest.			
05/22/2024	Maribel Fontanez	Prepare supplement to first interim fee application.	0.70	465.00	325.50
05/23/2024	Maribel Fontanez	Review monthly fee statements; communicate with R. Sainvil as to payment of same.	0.20	465.00	93.00
05/28/2024	Mariana Conrado	Exchange emails with the team to address their questions on Demarest's engagement letter.	0.20	545.00	109.00
05/28/2024	Maribel Fontanez	Finalize draft comparative rate supplement to fee application; communicate with P. Keenan regarding same.	0.50	465.00	232.50
05/28/2024	Paul Keenan	Drafting and revising fee applications.	0.30	1,645.00	493.50
05/28/2024	Reginald Sainvil	Correspondence regarding Brazil conflicts counsel.	0.20	1,195.00	239.00
05/28/2024	Reginald Sainvil	Correspondence regarding fee applications.	0.20	1,195.00	239.00
05/29/2024	Maribel Fontanez	Review interim compensation order (.5); draft notice of hearing fee applications (.7); communicate with R.	1.30	465.00	604.50



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/29/2024	Paul Keenan	Sainvil regarding hearing date (.1). Correspondence regarding retention of counsel in Guatemala.	0.30	1,645.00	493.50
05/30/2024	Maribel Fontanez	Communicate with R. Sainvil regarding objection deadline and payment for Rothschild April monthly fee statement.	0.20	465.00	93.00
05/30/2024	Maribel Fontanez	Prepare Riveron monthly fee statement; communicate with R. Sainvil regarding same.	0.20	465.00	93.00
05/30/2024	Maribel Fontanez	Commence working on April monthly fee statement for RESOR; communicate with R. Sainvil regarding same.	0.40	465.00	186.00
05/30/2024	Maribel Fontanez	Finalize, e-file and circulate for service notice of hearing fee applications; communicate with R. Sainvil regarding same.	0.50	465.00	232.50
05/31/2024	Maribel Fontanez	Prepare notice of filing declaration of Fox Horan as OCP; communicate with R. Sainvil regarding same.	0.20	465.00	93.00
05/31/2024	Maribel Fontanez	Finalize, e-file, process for service and calendar Riveron monthly fee statement for April 2024.	0.30	465.00	139.50
05/31/2024	Maribel Fontanez	Review list of OCP professionals; communicate with R. Sainvil regarding same.	0.10	465.00	46.50



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>B185-Assumption/Rejection of Leases and Contracts</b>					
<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/01/2024	Reginald Sainvil	Analyze and resolve issues regarding contract rejection.	0.40	1,195.00	478.00
05/03/2024	Reginald Sainvil	Analyze and address lease rejection issues in connection with Specialty sale.	0.40	1,195.00	478.00
05/07/2024	Reginald Sainvil	Analyze and revise assignment and assumption agreements.	0.80	1,195.00	956.00
05/08/2024	Paul Keenan	Numerous correspondence regarding assumption and assignment of receivables.	0.40	1,645.00	658.00
05/13/2024	Lori Seavey	Emails with R. Sainvil regarding withdrawal of motion to assume V2 contract (.1); draft notice of withdrawal (.7); receive approved notice and attend to filing (.2); revise hearing agenda re: same and email to R. Sainvil (.3).	1.30	465.00	604.50
05/13/2024	Maribel Fontanez	Communicate with R. Sainvil regarding V2 motion.	0.10	465.00	46.50
05/14/2024	Maribel Fontanez	Prepare notice of hearing of motion to assume - assign StoneX contract.	0.30	465.00	139.50
05/14/2024	Maribel Fontanez	Assist in preparation of motion to assume - assign StoneX contract; communicate with R. Sainvil.	0.40	465.00	186.00
05/15/2024	Reginald Sainvil	Review and revise motion to assume and	0.80	1,195.00	956.00



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		assign certain contracts.			
<b>B190-Other Contested Matters</b>					
<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/01/2024	Paul Keenan	Correspondence and analysis regarding status of litigation in Brazil.	0.30	1,645.00	493.50
05/01/2024	Paul Keenan	Correspondence and analysis regarding litigation in Mexico.	0.30	1,645.00	493.50
05/01/2024	Paul Keenan	Correspondence and analysis regarding litigation in Honduras and Guatemala.	0.30	1,645.00	493.50
05/01/2024	Reginald Sainvil	Telephone conference with A. Morley regarding Vietnam sale.	0.50	1,195.00	597.50
05/02/2024	Thais Barboza	Daily analysis of the updated court records in order to verify possible measures to be taken on it, as requested by M. Conrado.	0.20	335.00	67.00
05/03/2024	Thais Barboza	Daily analysis of the updated court records in order to verify possible measures to be taken on it, as requested by M. Conrado.	0.20	335.00	67.00
05/06/2024	Paul Keenan	Numerous correspondence regarding strategy for obtaining approval of WHOA proceeding.	1.20	1,645.00	1,974.00
05/06/2024	Paul Keenan	Analysis of arguments from counsel for Rabo and UCC regarding approval of WHOA.	0.30	1,645.00	493.50
05/06/2024	Thais Barboza	Daily analysis of the updated court records	0.20	335.00	67.00





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		in order to verify possible measures to be taken on it, as requested by M. Conrado.			
05/07/2024	Paul Keenan	Numerous correspondence regarding treatment of liens in WHOA proceeding and other issues.	0.60	1,645.00	987.00
05/07/2024	Paul Keenan	Numerous correspondence regarding observer and requests from same for due diligence information.	0.50	1,645.00	822.50
05/07/2024	Paul Keenan	Numerous correspondence and analysis regarding issues arising in WHOA proceeding and potential resolution of same.	0.60	1,645.00	987.00
05/07/2024	Thais Barboza	Daily analysis of the updated court records in order to verify possible measures to be taken on it, as requested by M. Conrado.	0.20	335.00	67.00
05/08/2024	Paul Keenan	Numerous correspondence regarding status of Brazilian litigation.	0.30	1,645.00	493.50
05/08/2024	Reginald Sainvil	Analyze status update regarding Recognition Proceeding in Brazil.	0.70	1,195.00	836.50
05/08/2024	Reginald Sainvil	Analyze issues regarding causes of action involving the Debtor.	1.30	1,195.00	1,553.50
05/08/2024	Thais Barboza	Daily analysis of the updated court records in order to verify	0.20	335.00	67.00



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05/09/2024	Paul Keenan	possible measures to be taken on it, as requested by M. Conrado. Numerous correspondence and analysis regarding Brazilian recognition proceeding.	0.40	1,645.00	658.00
05/09/2024	Thais Barboza	Daily analysis of the updated court records in order to verify possible measures to be taken on it, as requested by M. Conrado.	0.30	335.00	100.50
05/10/2024	Eugenia Vazquez	Resolve questions regarding company liquidation in Spain.	2.00	508.23	1,016.46
05/10/2024	Mariana Conrado	Exchange emails with Demarest team to discuss the pending measures to provide the filing of the interlocutory appeal and additional adjustments on the draft.	0.40	545.00	218.00
05/10/2024	Paul Keenan	Conference with Dutch advisors regarding status of WHOA proceeding.	0.30	1,645.00	493.50
05/10/2024	Thais Barboza	Daily analysis of the updated court records in order to verify possible measures to be taken on it, as requested by M. Conrado.	0.20	335.00	67.00
05/10/2024	Trung Nguyen Nguyen	Discuss with Nguyen Phuoc Anh Tram regarding KPMG's proposed order of application.	0.30	200.00	60.00
05/12/2024	Paul Keenan	Correspondence and	0.50	1,645.00	822.50



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05/13/2024	Paul Keenan	analysis regarding open issues under Dutch WHOA proceeding and Brazilian ancillary proceeding. Lengthy correspondence with RESOR regarding questions and issues on sanctioning of WHOA plan.	0.70	1,645.00	1,151.50
05/13/2024	Paul Keenan	Conference call with RESOR and Dutch Observer regarding WHOA plan process and diligence requests by Observer.	0.50	1,645.00	822.50
05/13/2024	Paul Keenan	Conference with RESOR to review draft WHOA plan and resolve outstanding issues under same.	1.00	1,645.00	1,645.00
05/13/2024	Thais Barboza	Daily analysis of the updated court records in order to verify possible measures to be taken on it, as requested by M. Conrado.	0.30	335.00	100.50
05/14/2024	Gledson Marques de Campos	Review and amend the appeal.	4.80	850.00	4,080.00
05/14/2024	Thais Barboza	Daily analysis of the updated court records in order to verify possible measures to be taken on it, as requested by M. Conrado.	0.20	335.00	67.00
05/15/2024	Thais Barboza	Daily analysis of the updated court records in order to verify possible measures to be taken on it, as	0.30	335.00	100.50



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05/15/2024	Trung Nguyen Nguyen	requested by M. Conrado. Review checklist and application for change of authorized rep and legal rep prepared by KPMG.	0.40	200.00	80.00
05/16/2024	Paul Keenan	Conference with Dutch Observer and follow up regarding same.	0.50	1,645.00	822.50
05/16/2024	Thais Barboza	Daily analysis of the updated court records in order to verify possible measures to be taken on it, as requested by M. Conrado.	0.30	335.00	100.50
05/17/2024	Mariana Conrado	Review the status of the case; exchange emails the team to inform them on the status of the case.	0.30	545.00	163.50
05/17/2024	Paul Keenan	Conference with counsel in Guatemala regarding wind down issues and threatened lawsuits.	0.80	1,645.00	1,316.00
05/17/2024	Thais Barboza	Daily analysis of the updated court records in order to verify possible measures to be taken on it, as requested by M. Conrado.	0.20	335.00	67.00
05/20/2024	Mariana Conrado	Review the updated court copies of the case to verify possible measures to be taken on it; exchange emails with the team to inform it about the briefs filed by ABC Bank and by Santander in the	0.40	545.00	218.00



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05/20/2024	Paul Keenan	appeal; exchange emails with B&M team to share with it the documents received form Vinícius Barquette. Numerous correspondence regarding status of proceedings in Brazil.	0.40	1,645.00	658.00
05/20/2024	Thais Barboza	Daily analysis of the updated court records in order to verify possible measures to be taken on it, as requested by M. Conrado.	0.20	335.00	67.00
05/21/2024	John Dodd	Address open issues with Banco Safra proceedings in Brazil.	0.20	1,345.00	269.00
05/21/2024	Merredith Fong-Akan	Obtain an original extract of Mercon B. V. and a certified copy of the deed of incorporation at the notary where the deed has been executed and arrange legalization up to and including the embassy of Vietnam.	1.20	297.37	356.84
05/21/2024	Paul Keenan	Numerous correspondence and analysis regarding status of Brazilian ancillary proceeding.	0.40	1,645.00	658.00
05/21/2024	Paul Keenan	Brief correspondence and analysis regarding settlements motion.	0.30	1,645.00	493.50
05/21/2024	Thais Barboza	Daily analysis of the updated court records in order to verify possible measures to be taken on it, as requested by M. Conrado.	0.20	335.00	67.00



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/22/2024	Kim Tan	Legalize the signature of S. Stemmler genannt Parchen on two decisions and one power of attorney on behalf of Mercon B.V.	0.40	832.63	333.05
05/22/2024	Mariana Conrado	Review the updated court copies of the case to verify possible measures to be taken on it; exchange emails with B&M team to answer its questions on the possible proposal receipt from Safra; exchange emails with the team to inform it on the status of the case.	0.40	545.00	218.00
05/22/2024	Merredith Fong-Akan	Prepare legalization of the signaturer of S. Stemmler genannt Parchen on two decisions and one power of attorney on behalf of Mercon B. V. .	1.10	297.37	327.11
05/22/2024	Paul Keenan	Analysis and correspondence regarding litigation in Guatemala.	0.30	1,645.00	493.50
05/22/2024	Paul Keenan	Numerous correspondence regarding status of proceeding in Brazil.	0.30	1,645.00	493.50
05/22/2024	Thais Barboza	Daily analysis of the updated court records in order to verify possible measures to be taken on it, as requested by M. Conrado.	0.30	335.00	100.50
05/23/2024	Mariana Conrado	Exchange emails with the team to inform it on the contact made	0.20	545.00	109.00



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		by Santander to obtain additional information on the foreign representatives of Mercon and the measures to be taken about it.			
05/23/2024	Paul Keenan	Conference with Resor regarding procedure for approval of Dutch WHOA plan and best strategy for same.	1.80	1,645.00	2,961.00
05/23/2024	Paul Keenan	Conference with Resor and Dutch Observer regarding WHOA plan and process for approval of same.	0.70	1,645.00	1,151.50
05/23/2024	Thais Barboza	Daily analysis of the updated court records in order to verify possible measures to be taken on it, as requested by M. Conrado.	0.20	335.00	67.00
05/24/2024	Paul Keenan	Numerous correspondence regarding status of and issues arising under WHOA proceeding in the Netherlands.	0.40	1,645.00	658.00
05/24/2024	Thais Barboza	Daily analysis of the updated court records in order to verify possible measures to be taken on it, as requested by M. Conrado.	0.30	335.00	100.50
05/27/2024	Merredith Fong-Akan	Arrange for legalization of the two decisions, power of attorney, extract and articles of association of Mercon B.V. up to and including the embassy of Vietnam. .	1.90	297.37	565.00



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05/27/2024	Thais Barboza	Daily analysis of the updated court records in order to verify possible measures to be taken on it, as requested by M. Conrado.	0.30	335.00	100.50
05/28/2024	Paul Keenan	Correspondence and analysis regarding issues arising in Brazil ancillary proceeding.	0.50	1,645.00	822.50
05/28/2024	Paul Keenan	Correspondence and analysis regarding issues arising under WHOA proceeding.	0.40	1,645.00	658.00
05/28/2024	Paul Keenan	Brief analysis of motion to approve accounts receivable settlements.	0.20	1,645.00	329.00
05/28/2024	Thais Barboza	Daily analysis of the updated court records in order to verify possible measures to be taken on it, as requested by M. Conrado.	0.30	335.00	100.50
05/29/2024	Paul Keenan	Correspondence with Resor regarding requests from and positions of Observer in WHOA proceeding.	0.40	1,645.00	658.00
05/29/2024	Thais Barboza	Daily analysis of the updated court records in order to verify possible measures to be taken on it, as requested by M. Conrado.	0.20	335.00	67.00
05/30/2024	Paul Keenan	Conference with Resor and Observer regarding chapter 11 and WHOA process and follow up regarding same.	1.00	1,645.00	1,645.00
05/30/2024	Paul Keenan	Numerous	0.60	1,645.00	987.00





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05/31/2024	Paul Keenan	correspondence and analysis regarding status and prosecution of WHOA process. Follow up conference with CRO regarding status of WHOA proceeding.	0.50	1,645.00	822.50
05/31/2024	Paul Keenan	Numerous correspondence with Resor and others regarding strategy continuance of WHOA.	0.80	1,645.00	1,316.00
05/31/2024	Paul Keenan	Conference with CRO regarding WHOA proceeding.	0.40	1,645.00	658.00

**B195-Non-Working Travel**

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/17/2024	Paul Keenan	Return travel from NYC for disclosure statement hearings and meetings with CRO.	6.00	822.50	4,935.00

**B210-Business Operations**

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/08/2024	Matthew Smith	Review and discuss potential dispute with coffee counterparty regarding payment of amounts owed under coffee forward contracts.	0.40	1,295.00	518.00
05/09/2024	Matthew Smith	Review and discuss potential dispute with coffee counterparty regarding payment of amounts owed under coffee forward contracts.	0.50	1,295.00	647.50
05/14/2024	Silvia Bernardino	Exchange of emails with J.Susko regarding the signature of the	0.30	685.00	205.50



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		assumption assignment agreement.			

**B230-Financing/Cash Collateral**

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/02/2024	Kevin Whittam	Call with P. Keenan and H. Light to discuss provisions of final cash collateral order.	0.50	1,345.00	672.50
05/02/2024	Paul Keenan	Conference with F. Cuadra regarding cash collateral issues.	0.30	1,645.00	493.50
05/02/2024	Paul Keenan	Conference with CRO, Riveron and K. Whittam to review cash collateral budget and terms of final cash collateral order.	0.70	1,645.00	1,151.50
05/02/2024	Paul Keenan	Weekly conference with secured lender syndicate.	0.40	1,645.00	658.00
05/09/2024	Paul Keenan	Conference with Rabobank and syndicate and follow up regarding same.	0.60	1,645.00	987.00
05/23/2024	Paul Keenan	Weekly conference call with lenders.	0.50	1,645.00	822.50
05/24/2024	Paul Keenan	Conference with F. Cuadra regarding issues arising under loan guarantees.	0.20	1,645.00	329.00
05/30/2024	Paul Keenan	Conference with Rabobank and secured lender group; follow up regarding same.	0.70	1,645.00	1,151.50

**B310-Claims Administration and Objections**

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/02/2024	Reginald Sainvil	Analyze claims analysis and issues arising in connection with Dutch Law SME Claims.	1.80	1,195.00	2,151.00
05/03/2024	Paul Keenan	Correspondence with	0.40	1,645.00	658.00



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/10/2024	Reginald Sainvil	Resor regarding claims analysis. Analyze potential Dutch Law SME settlements.	0.40	1,195.00	478.00
05/12/2024	Paul Keenan	Initial analysis of claims register after bar date.	0.30	1,645.00	493.50
05/22/2024	Reginald Sainvil	Review comments to bar date motion.	0.70	1,195.00	836.50
05/23/2024	Paul Keenan	Analysis of motion and order on claim settlement.	0.20	1,645.00	329.00

**B320-Plan and Disclosure Statement**

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/01/2024	Mark Bloom	Coordination via multiple emails with RESOR & Riveron (2.3) and telephone conference with Krijn (.3) on Plan issues, including US and Netherlands solicitation and timing rules and Plan features affecting same, including FMO issues and resolution of same, and with Brazil team and Riveron on strategy for Brazil banks and implementation of Plan in Brazil (.3).	2.90	1,645.00	4,770.50
05/01/2024	Paul Keenan	Conference with senior management team and CRO regarding disclosure statement revisions and other plan issues.	0.80	1,645.00	1,316.00
05/01/2024	Paul Keenan	Conference call with Resor regarding revisions to disclosure	0.80	1,645.00	1,316.00



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		statement for WHOA plan.			
05/01/2024	Paul Keenan	Analysis and revision of plan before filing same.	1.80	1,645.00	2,961.00
05/01/2024	Paul Keenan	Drafting and revising disclosure statement.	1.30	1,645.00	2,138.50
05/01/2024	Paul Keenan	Further drafting and revising of disclosure statement.	2.30	1,645.00	3,783.50
05/01/2024	Paul Keenan	Correspondence and analysis regarding Rabo's position on WHOA plan and basis for approval of same.	0.50	1,645.00	822.50
05/01/2024	Paul Keenan	Drafting and revising motion to approve disclosure statement and solicitation process.	0.80	1,645.00	1,316.00
05/01/2024	Paul Keenan	Numerous correspondence regarding FMO's position on plan treatment.	0.40	1,645.00	658.00
05/01/2024	Reginald Sainvil	Analyze further developments in preparation of Dutch WHOA plan and assess dual confirmation time line concerns.	1.80	1,195.00	2,151.00
05/01/2024	Reginald Sainvil	Further analyze and revise chapter 11 plan and disclosure statement.	1.80	1,195.00	2,151.00
05/01/2024	Reginald Sainvil	Analyze and revise drivers leading to chapter 11 for inclusion in disclosure statement.	0.80	1,195.00	956.00
05/01/2024	Reginald Sainvil	Correspondence with secured parties' counsel regarding the Plan.	0.40	1,195.00	478.00



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05/02/2024	Lori Seavey	Emails with R. Sainvil and Kroll regarding service of filings related to plan and disclosure statement (.2).	0.20	465.00	93.00
05/02/2024	Mark Bloom	Further progress of Plan and Disclosure Statement in respect of foreign law and case issues, including selective review of coffee market explanation from B.V. director for inclusion in Disclosure Statement (.5) and exchange of multiple emails with RESOR team regarding treatment of B.V. SME creditors under Chapter 11 and Dutch WHOA Plans (.6); selective review of as-filed Plan, Disclosure Statement and Procedures Motion, and planning for funding and WHOA discussions with Rabo and Committee counsel (.3).	1.40	1,645.00	2,303.00
05/02/2024	Paul Keenan	Conference with F. Cuadra regarding disclosure statement and plan process.	0.20	1,645.00	329.00
05/02/2024	Paul Keenan	Correspondence, analysis and revisions to disclosure statement and plan in anticipation of filing same.	2.10	1,645.00	3,454.50
05/02/2024	Paul Keenan	Conference with R. Sainvil regarding	0.20	1,645.00	329.00



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05/02/2024	Paul Keenan	filing of disclosure statement. Correspondence and analysis regarding scheduling of plan process and motion to approve disclosure statement.	0.40	1,645.00	658.00
05/02/2024	Paul Keenan	Correspondence and analysis regarding motion to shorten time on approval of disclosure statement.	0.40	1,645.00	658.00
05/02/2024	Paul Keenan	Further correspondence, analysis and revisions to disclosure statement and plan in anticipation of filing same.	2.20	1,645.00	3,619.00
05/02/2024	Reginald Sainvil	Analyze and revise disclosure statement and numerous related correspondence.	2.40	1,195.00	2,868.00
05/02/2024	Reginald Sainvil	Analyze and revise plan and procedures motion and finalize related documents for filing.	1.00	1,195.00	1,195.00
05/02/2024	Reginald Sainvil	Analyze issues concerning Dutch Law SME claims and outline potential resolutions.	1.60	1,195.00	1,912.00
05/03/2024	Mark Bloom	Selective review of Plan & Disclosure Statement provisions relating to Dutch WHOA and Brazil ancillary enforcement (1.2) and drafting of internal email regarding further revision of same (1.5), and planning for	3.60	1,645.00	5,922.00



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05/03/2024	Paul Keenan	telephone conference with Rabo and Committee counsel (.7); exchange of emails with RESOR regarding Disclosure Statement and sharing of information with Observer (.2). Numerous correspondence with creditors and other parties in interest regarding filing of plan and disclosure statement, and schedule for plan confirmation process.	0.80	1,645.00	1,316.00
05/03/2024	Paul Keenan	Conference with shareholder regarding update on plan process.	0.80	1,645.00	1,316.00
05/03/2024	Reginald Sainvil	Analyze and revise notice regarding disclosure statement hearing.	0.30	1,195.00	358.50
05/03/2024	Reginald Sainvil	Analyze convenience claim election and impact on SME claim pool.	0.50	1,195.00	597.50
05/06/2024	Mark Bloom	Further coordination of US and Dutch WHOA plans with RESOR and Riveron, including exchange of multiple emails regarding claims classification and funding of SME and convenience claims pools, surplus value analysis for WHOA Plan and related issues (1.2), and review of RESOR &	3.00	1,645.00	4,935.00



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		Riveron calculations regarding same (.2); review of IBagby email regarding best interests analysis and related preparation for (.3) & participation in telephone conference with RESOR & HLight regarding Chapter 11 and Dutch WHOA plans, classification, treatment and funding of SME and Convenience Class claims (1.1), and followup email to PKeenan regarding best interests analysis in US and Netherlands (.2).			
05/06/2024	Paul Keenan	Conference with Resor regarding harmonization of Ch 11 and WHOA plan and next steps in process; follow up regarding same.	1.00	1,645.00	1,645.00
05/06/2024	Paul Keenan	Numerous correspondence regarding issues arising under chapter 11 plan relating to Dutch bankruptcy law.	0.40	1,645.00	658.00
05/06/2024	Paul Keenan	Multiple correspondence with creditors and other parties in interest regarding plan process.	0.40	1,645.00	658.00
05/06/2024	Paul Keenan	Conference with senior management team and CRO regarding various	0.50	1,645.00	822.50





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05/06/2024	Paul Keenan	issues in plan and liquidation process. Conference with R. Sainvil regarding plan confirmation process.	0.20	1,645.00	329.00
05/06/2024	Paul Keenan	Conference with CRO regarding changes for approval of plan by Dutch court.	0.20	1,645.00	329.00
05/06/2024	Reginald Sainvil	Analyze updated claims analysis calculations and assess proposed treatment of Class 4B claims and alternatives.	1.80	1,195.00	2,151.00
05/06/2024	Reginald Sainvil	Address comments from UCC to certain proposed plan solicitation materials.	0.60	1,195.00	717.00
05/06/2024	Reginald Sainvil	Analyze outline regarding potential advantages of WHOA plan over liquidation.	0.80	1,195.00	956.00
05/06/2024	Reginald Sainvil	Analyze Mercon BV creditor list.	0.60	1,195.00	717.00
05/07/2024	Mark Bloom	Further planning for & coordination with RESOR on Chapter 11 and Dutch WHOA Plans, including strategy regarding best interests test, Rabobank liens and funding inducement (.7), and exchange of multiple emails with RESOR, HLight regarding same (1.0).	1.70	1,645.00	2,796.50
05/07/2024	Paul Keenan	Conference with R. Sainvil regarding plan confirmation process.	0.30	1,645.00	493.50
05/07/2024	Paul Keenan	Conference with party in interest regarding disclosure statement	0.50	1,645.00	822.50



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05/07/2024	Paul Keenan	and plan confirmation process. Conference with counsel for Rabo and UCC regarding plan, disclosure statements and ballots.	0.80	1,645.00	1,316.00
05/07/2024	Paul Keenan	Conference with CRO regarding plan confirmation timeline.	0.20	1,645.00	329.00
05/07/2024	Reginald Sainvil	Analyze draft liquidation analysis.	0.70	1,195.00	836.50
05/07/2024	Reginald Sainvil	Develop plan for confirmation hearing notice publication in foreign jurisdictions.	0.60	1,195.00	717.00
05/07/2024	Reginald Sainvil	Analyze revised schedules and assess impact on solicitation and noticing in connection with the chapter 11 plan.	1.60	1,195.00	1,912.00
05/07/2024	Reginald Sainvil	Telephone conference regarding plan and disclosure statement status.	0.50	1,195.00	597.50
05/07/2024	Reginald Sainvil	Analyze and implement further comments from major stakeholders to plan and disclosure statement materials.	0.90	1,195.00	1,075.50
05/08/2024	Mark Bloom	Further coordination of US, Dutch and Brazil proceedings, including exchange of emails with HLight and Brazil team advice on bank lender remedies (.7) and review of Brazil risk references in Plan and Disclosure Statement (.3), Dutch best interests test and	1.20	1,645.00	1,974.00



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05/08/2024	Reginald Sainvil	related issues of Plan funding (.2). Analyze issues regarding FMO facilities and plan treatment.	1.30	1,195.00	1,553.50
05/08/2024	Reginald Sainvil	Analyze and address concerns and issues from interested parties regarding the plan and disclosure statement.	2.20	1,195.00	2,629.00
05/09/2024	Mark Bloom	Followup on Brazil developments, and update/revision of Disclosure Statement Risk Factors.	0.40	1,645.00	658.00
05/09/2024	Paul Keenan	Numerous correspondence and analysis regarding proposed revisions to plan and disclosure statement.	1.30	1,645.00	2,138.50
05/09/2024	Paul Keenan	Conference with R. Sainvil regarding plan confirmation process.	0.30	1,645.00	493.50
05/09/2024	Paul Keenan	Correspondence and analysis regarding liquidation analysis for WHOA plan and chapter 11 plan.	0.60	1,645.00	987.00
05/10/2024	Mark Bloom	Exchange of emails w/ Krijn, HLight regarding update on Brazil (.7); revision of draft Disclosure Statement regarding Risk Factors (1.2) and accompanying Plan provisions regarding Classes 4B and 5, Liquidating Trustee duties (.9), and instructions to RSainvil regarding classification and	4.10	1,645.00	6,744.50



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		funding issues (.4); selective review of UST Objection to Disclosure Statement and email correspondence concerning resolution of same (.3); preparation for telephone conference with Observer and followup on same (.2); planning for resolution with Brazil banks so as to facilitate acceptance of WHOA Plan, and exchange of emails with Krijn, Harve and RESOR team regarding same (.4).			
05/10/2024	Paul Keenan	Correspondence and analysis regarding revisions to ballots, disclosure statement and plan of liquidation.	0.60	1,645.00	987.00
05/10/2024	Paul Keenan	Conference call with CRO and R Sainvil regarding US Trustee objection to disclosure statement and response to same, and follow up regarding same.	1.10	1,645.00	1,809.50
05/10/2024	Paul Keenan	Close analysis of US Trustee objection to disclosure statement and solicitation procedures.	0.80	1,645.00	1,316.00
05/10/2024	Paul Keenan	Conference with R Sainvil regarding preparation for disclosure statement	1.00	1,645.00	1,645.00



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05/10/2024	Paul Keenan	hearing, and follow up regarding same. Legal research regarding third party plan releases.	0.80	1,645.00	1,316.00
05/10/2024	Paul Keenan	Numerous correspondence and analysis regarding sanctioning of plan of liquidation in WHOA proceeding.	0.80	1,645.00	1,316.00
05/10/2024	Reginald Sainvil	Analyze UST disclosure statement objection, begin outline for response, and assess potential resolution options presented.	3.40	1,195.00	4,063.00
05/10/2024	Reginald Sainvil	Analyze FMO comments to Chapter 11 Plan.	0.80	1,195.00	956.00
05/10/2024	Reginald Sainvil	Strategy conference with Baker team regarding UST disclosure statement objection.	0.50	1,195.00	597.50
05/10/2024	Reginald Sainvil	Prepare outline to address potential disparate treatment or unfair discrimination claims in connection with the Chapter 11 plan.	0.80	1,195.00	956.00
05/10/2024	Reginald Sainvil	Analyze creditor committee letter in support of the Plan.	0.30	1,195.00	358.50
05/11/2024	Paul Keenan	Conference with R. Sainvil regarding preparation of response and declaration for motion to approve disclosure statement.	0.80	1,645.00	1,316.00
05/11/2024	Paul Keenan	Close analysis of US Trustee's objections to	0.50	1,645.00	822.50



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05/11/2024	Reginald Sainvil	exculpation provisions. Analyze case law regarding consideration required to support debtor releases.	2.30	1,195.00	2,748.50
05/11/2024	Reginald Sainvil	Analyze case law regarding release and appropriate manner to manifest consent.	2.70	1,195.00	3,226.50
05/11/2024	Reginald Sainvil	Draft and revise response in opposition to UST disclosure statement objection.	1.00	1,195.00	1,195.00
05/12/2024	Lori Seavey	Draft shell for reply in support of disclosure statement (1.7); email to R. Sainvil regarding draft and precedent (.1); emails with R. Sainvil and research regarding Revlon case filings (.2).	2.00	465.00	930.00
05/12/2024	Paul Keenan	Correspondence and analysis regarding revisions to plan and disclosure statement.	0.50	1,645.00	822.50
05/12/2024	Paul Keenan	Preparation for hearing on motion to approve disclosure statement and solicitation procedures.	0.60	1,645.00	987.00
05/12/2024	Paul Keenan	Close analysis of US Trustee objection to disclosure statement.	0.50	1,645.00	822.50
05/12/2024	Reginald Sainvil	Develop outline for potential resolution of issues related to Dutch Law SME claim pool analysis.	0.80	1,195.00	956.00
05/12/2024	Reginald Sainvil	Conduct legal research regarding opt in and	1.60	1,195.00	1,912.00



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05/12/2024	Reginald Sainvil	opt out mechanics for third party releases. Continue to draft and revise response to UST disclosure statement objection.	4.60	1,195.00	5,497.00
05/13/2024	Annasofia Roig	Review and analyze case law relied upon by U.S. Trustee in objection; draft summaries of same; correspondences with M. Matheissen regarding same.	6.30	895.00	5,638.50
05/13/2024	Lori Seavey	Emails and telephone call with R. Sainvil regarding reply supporting disclosure statement (.2); receive draft and review in preparation for filing (.6); attend to efilng (.2); emails with Baker team and Kroll re service (.1); research disclosure statement precedents and compile materials inn advance of hearing (2.8); email to R. Sainvil re same (.2).	4.10	465.00	1,906.50
05/13/2024	Mark Bloom	Review of open questions regarding Dutch WHOA best interests test and related preparation for (.7) & participation in weekly telephone conference with Observer; updated on revision of Plan and Disclosure Statement, open issues from 10 May (.4) and followup with Krijn re same	2.50	1,645.00	4,112.50



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/13/2024	Michael Matthiesen	(.2); final pre-Disclosure Hearing revision of draft Plan and Disclosure Statement, incorporating points as discussed with Krijn and RSainvil (1.2). Email correspondence with R. Sainvil regarding case citation check (0.1); Telephone conference with R. Sainvil regarding same (0.2); Research and analyze case citations in Reply in Support of Disclosure Statement (2.0); Teams correspondence with A. Roig regarding unpublished cases (0.3); Finalize case citation summaries (1.5); Email correspondence with R. Sainvil regarding same (0.1).	4.20	670.00	2,814.00
05/13/2024	Paul Keenan	Multiple correspondence regarding revisions to disclosure statement and plan in anticipation of hearing.	0.40	1,645.00	658.00
05/13/2024	Paul Keenan	Conference with R. Sainvil regarding response to objection of US Trustee to approval of disclosure statement and other relief.	0.30	1,645.00	493.50
05/13/2024	Paul Keenan	Drafting and revising response to US	0.60	1,645.00	987.00





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05/13/2024	Paul Keenan	Trustee objection to approval of disclosure statement. Drafting and revising response to US Trustee objection to approval of disclosure statement.	0.50	1,645.00	822.50
05/13/2024	Reginald Sainvil	Prepare for hearing regarding disclosure statement.	2.10	1,195.00	2,509.50
05/13/2024	Reginald Sainvil	Continue to further review and revise the plan and disclosure statement to include Dutch law considerations and feedback from major stakeholders.	2.20	1,195.00	2,629.00
05/13/2024	Reginald Sainvil	Analyze and revise reply in support of disclosure statement in opposition to UST objection.	2.80	1,195.00	3,346.00
05/13/2024	Reginald Sainvil	Analyze and revise solicitation mailing matrix draft and lender register draft.	1.40	1,195.00	1,673.00
05/14/2024	John Dodd	Call with R. Sainvil regarding Plan releases.	0.50	1,345.00	672.50
05/14/2024	Lori Seavey	Emails with R. Sainvil and assist with hearing prep on disclosure statement (.3); compile requested filings in advance of hearing (.2); compile precedent filings (.3); draft notice of continued hearing and agenda (.3); emails with R. Sainvil re same (.2); updates to case calendar re same	1.70	465.00	790.50



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		(.2); attend to filing notice of continued hearing and email Kroll regarding service (.2).			
05/14/2024	Maribel Fontanez	Research approved form of ballot; communicate with R. Sainvil regarding same.	0.30	465.00	139.50
05/14/2024	Maribel Fontanez	Prepare, finalize and e-file notices of filing amended plan and disclosure statement; finalize and e-file amended plan and disclosure statement; communicate with P. Keenan regarding same.	1.40	465.00	651.00
05/14/2024	Maribel Fontanez	Draft various plan / disclosure statement related documents (Notice of Filing Exhibits to Disclosure Statement, Debtors' Cover Letter, Notice of Non-Voting Status - Impaired Classes and Opt-In Notice; communicate with R. Sainvil regarding same.	4.70	465.00	2,185.50
05/14/2024	Mark Bloom	Followup on filing of amendments to Plan and Disclosure Statement and disclosure hearing (.5), and further coordination with RESOR team on WHOA Plan, solicitation for Chapter 11 Plan after	0.70	1,645.00	1,151.50



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05/14/2024	Paul Keenan	approval of Disclosure Statement (.2). Drafting and revising amended plan and disclosure statement and notices for same; conference with R. Sainvil regarding same.	2.50	1,645.00	4,112.50
05/14/2024	Paul Keenan	Conference with Rabo, UCC and advisors regarding liquidation analysis and follow up regarding same.	0.80	1,645.00	1,316.00
05/14/2024	Paul Keenan	Conference with CRO regarding liquidation analysis and follow up regarding same.	0.50	1,645.00	822.50
05/14/2024	Paul Keenan	Conference with counsel for Rabo and UCC regarding revisions to plan and disclosure statement and follow up with R. Sainvil regarding same.	1.10	1,645.00	1,809.50
05/14/2024	Paul Keenan	Drafting and revising second amended plan and disclosure statement, and conferences with R. Sainvil regarding same.	1.60	1,645.00	2,632.00
05/14/2024	Paul Keenan	Drafting and revising supplemental affidavit for CRO in support of plan.	0.90	1,645.00	1,480.50
05/14/2024	Paul Keenan	Preparation with R. Sainvil before hearing; hearing on disclosure statement and other matters; conference following same.	1.80	1,645.00	2,961.00
05/14/2024	Reginald Sainvil	Strategy conference	1.00	1,195.00	1,195.00



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		regarding plan and disclosure statement revisions.			
05/14/2024	Reginald Sainvil	Prepare for and attend disclosure statement hearing.	2.00	1,195.00	2,390.00
05/14/2024	Reginald Sainvil	Strategy conference regarding liquidation analysis.	0.50	1,195.00	597.50
05/14/2024	Reginald Sainvil	Analyze and revise exhibits to the Disclosure Statement.	0.80	1,195.00	956.00
05/14/2024	Reginald Sainvil	Review SME claim pool analysis and assess alternatives and risks.	0.90	1,195.00	1,075.50
05/14/2024	Reginald Sainvil	Draft and revise supplement to disclosure statement and alternative limitation on liability release provisions.	3.60	1,195.00	4,302.00
05/15/2024	John Dodd	Review and comment on revised Plan releases (.9); call with P. Keenan and R. Sainvil regarding continued Disclosure Statement hearing (.5).	1.40	1,345.00	1,883.00
05/15/2024	Lori Seavey	Review emails and filings regarding amended plan, disclosure statement, and exhibits (.2); telephone call with R. Sainvil re same (.1); draft notices for same (1.0); emails with R. Sainvil re same (.1); draft amended agenda and hearing notice for 5/16 for continued disclosure statement hearing (.2); emails with R. Sainvil re	3.60	465.00	1,674.00



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		same (.1); attend to filing and forward to Kroll and chambers (.2); receive final versions of second amended plan, disclosure statement, blacklines, and exhibits and prepare for filing and attend to filing (1.7).			
05/15/2024	Mark Bloom	Followup w/Gledson on Brazilian bank and Plan voting/objection issues (.3), Krijn and RESOR team on Observer questions and timetable (.2), RSainvil regarding JWiles release provisions, Rabo/ Committee concerns re Class 4B & 5 funding (.3); review of & comment on draft WHOA Plan (.6)	1.40	1,645.00	2,303.00
05/15/2024	Paul Keenan	Preparation for continued hearing on approval of disclosure statement and solicitation materials and process.	1.70	1,645.00	2,796.50
05/15/2024	Paul Keenan	Multiple conferences with CRO regarding plan and disclosure statement revisions.	0.70	1,645.00	1,151.50
05/15/2024	Paul Keenan	Drafting and revising plan and disclosure statement; conferences with R. Sainvil regarding same.	2.10	1,645.00	3,454.50
05/15/2024	Paul Keenan	Further preparation for continued hearing on approval of disclosure statement and	1.50	1,645.00	2,467.50



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05/15/2024	Reginald Sainvil	solicitation materials and process. Analyze plan class report in connection with anticipated solicitation process.	1.20	1,195.00	1,434.00
05/15/2024	Reginald Sainvil	Analyze case law and liquidation chapter 11 plans to develop further support for limitation on liability and release provisions.	2.00	1,195.00	2,390.00
05/15/2024	Reginald Sainvil	Analyze correspondence regarding claims and issues raised by Banco Safra and consider impact on disclosure statement.	0.50	1,195.00	597.50
05/15/2024	Reginald Sainvil	Draft and revise supplemental solicitation letter.	0.60	1,195.00	717.00
05/15/2024	Reginald Sainvil	Analyze and revise disclosure statement and joint plan of liquidation.	4.10	1,195.00	4,899.50
05/15/2024	Reginald Sainvil	Analyze draft WHOA Plan.	0.80	1,195.00	956.00
05/16/2024	Mark Bloom	Further review of & revision of draft WHOA Plan, including identification of issues for further consideration by RESOR and Riveron teams (1.0), drafting of language for UST on claims against multiple debtors (.5), and exchange of multiple emails regarding same (.4); followup email exchanges with	2.20	1,645.00	3,619.00



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		Dentons, HLight on exercise of Brazil remedies by banks, and planning for advice regarding same (.3).			
05/16/2024	Paul Keenan	Preparation for continued hearing on disclosure statement.	2.10	1,645.00	3,454.50
05/16/2024	Paul Keenan	Continued hearing on disclosure statement, and follow up conference with CRO regarding same.	1.60	1,645.00	2,632.00
05/16/2024	Paul Keenan	Conference call with CRO and senior management team regarding result of disclosure statement hearing.	0.50	1,645.00	822.50
05/16/2024	Paul Keenan	Conferences with R. Sainvil regarding revisions to plan and disclosure statement and drafting and revising same.	1.20	1,645.00	1,974.00
05/16/2024	Reginald Sainvil	Revise plan and disclosure statement, revised related solicitation materials and numerous related correspondence.	3.10	1,195.00	3,704.50
05/16/2024	Reginald Sainvil	Prepare for and attend continued disclosure statement hearing.	2.00	1,195.00	2,390.00
05/16/2024	Reginald Sainvil	Analyze and incorporate comments received from UST and other major stakeholders to the Chapter 11 Plan.	1.90	1,195.00	2,270.50
05/17/2024	John Dodd	Call with R. Sainvil regarding Disclosure Statement issue.	0.20	1,345.00	269.00
05/17/2024	Lori Seavey	Receive third amended	0.30	465.00	139.50



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		plan and disclosure statement for filing and attend to filing (.3).			
05/17/2024	Mark Bloom	Review of & exchange of multiple emails with HLight, Brazil team regarding remedies of Brazilian banks, options available to Rabobank and Committee.	0.50	1,645.00	822.50
05/17/2024	Paul Keenan	Conference with R. Sainvil regarding plan confirmation timeline.	0.20	1,645.00	329.00
05/17/2024	Reginald Sainvil	Draft and revise further disclosures regarding classification and treatment of certain claims.	1.30	1,195.00	1,553.50
05/17/2024	Reginald Sainvil	Revise Chapter 11 Plan, Disclosure Statement, ballots and related solicitation materials.	2.70	1,195.00	3,226.50
05/17/2024	Reginald Sainvil	Analyze case law regarding permissible breadth of released party provisions in chapter 11 plans.	2.40	1,195.00	2,868.00
05/17/2024	Reginald Sainvil	Review transcripts from May 14 and May 16 hearings.	0.80	1,195.00	956.00
05/18/2024	Paul Keenan	Analysis of amended plan and disclosure statement and blacklines of same.	0.80	1,645.00	1,316.00
05/18/2024	Paul Keenan	Analysis of timeline for confirmation and determining checklist for confirmation.	0.70	1,645.00	1,151.50
05/19/2024	Paul Keenan	Brief analysis of draft Dutch plan.	0.40	1,645.00	658.00
05/20/2024	Lori Seavey	Emails with R.	0.30	465.00	139.50





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05/20/2024	Mark Bloom	Sainvil; prepare redlines of latest version of disclosure statement and plan and email to chambers (.3). Update on Brazil bank litigation, and exchange of emails regarding Plan timing and related considerations (.3); followup with Krijn on Dutch WHOA Plan and instructions for same (.2).	0.50	1,645.00	822.50
05/20/2024	Paul Keenan	Numerous conferences and correspondence regarding revisions to disclosure statement at request of US Trustee.	0.60	1,645.00	987.00
05/20/2024	Paul Keenan	Conference with directors regarding status of plan of liquidation.	0.50	1,645.00	822.50
05/20/2024	Reginald Sainvil	Analyze and revise disclosures in the amended disclosure statement to address concerns raised by the UST.	1.80	1,195.00	2,151.00
05/21/2024	John Dodd	Call with R. Sainvil regarding open issues with disclosure statement and releases.	0.50	1,345.00	672.50
05/21/2024	Maribel Fontanez	Work on disclosure statement order; communicate with R. Sainvil regarding same.	0.30	465.00	139.50
05/21/2024	Paul Keenan	Correspondence and analysis regarding plan solicitation process.	0.30	1,645.00	493.50
05/21/2024	Paul Keenan	Correspondence and analysis regarding	0.40	1,645.00	658.00



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05/21/2024	Paul Keenan	requests from UST on disclosure statement. Numerous correspondence and analysis with R. Sainvil regarding revisions to disclosure statement and plan requested by US trustee.	1.20	1,645.00	1,974.00
05/21/2024	Paul Keenan	Numerous correspondence and analysis regarding revisions to disclosure statement and plan requested by US trustee.	1.40	1,645.00	2,303.00
05/21/2024	Reginald Sainvil	Telephone conference with A. Greenberg regarding status of plan and disclosure statement.	0.20	1,195.00	239.00
05/21/2024	Reginald Sainvil	Analyze and revise amended disclosure statement.	0.80	1,195.00	956.00
05/21/2024	Reginald Sainvil	Analyze voting class report and address related legal issues.	2.60	1,195.00	3,107.00
05/21/2024	Reginald Sainvil	Prepare analysis regarding voting process for holders of secured claims.	0.40	1,195.00	478.00
05/21/2024	Reginald Sainvil	Telephone conference with Kroll and Riveron teams regarding plan class report analysis.	0.90	1,195.00	1,075.50
05/21/2024	Reginald Sainvil	Strategy conference with J. Dodd regarding plan releases.	0.50	1,195.00	597.50
05/22/2024	Maribel Fontanez	Finalize and e-file fourth amended plan and disclosure statement; communicate with R.	0.60	465.00	279.00



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05/22/2024	Maribel Fontanez	Sainvil regarding same. Prepare, finalize and e-file notices of filing blacklined fourth amended plan and disclosure statement; communicate with R. Sainvil regarding same.	0.80	465.00	372.00
05/22/2024	Maribel Fontanez	Prepare exhibits to DS order; communicate with R. Sainvil regarding same.	0.50	465.00	232.50
05/22/2024	Mark Bloom	Coordination of foreign proceedings in respect of Chapter 11 Plan -- Brazil exchange of emails with Demarest regarding bank issues and negotiations (.3); preparation for (.2) & participation in telephone conference with Observer regarding WHOA Plan timing, substance and related issues	0.60	1,645.00	987.00
05/22/2024	Paul Keenan	Conference with R. Sainvil regarding revisions to disclosure statement.	0.20	1,645.00	329.00
05/22/2024	Paul Keenan	Multiple conference calls with R. Sainvil to revise disclosure statement and plan in response to requests from US Trustee; analysis of multiple correspondence from US Trustee regarding same.	2.40	1,645.00	3,948.00
05/22/2024	Reginald Sainvil	Conduct further legal	1.50	1,195.00	1,792.50



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05/22/2024	Reginald Sainvil	research regarding scope of releases. Continue to review and revise the plan, disclosure statement, and solicitation materials and numerous related correspondence.	3.10	1,195.00	3,704.50
05/22/2024	Reginald Sainvil	Analyze creditor queries regarding potential setoff rights in connection with chapter 11 plan.	1.40	1,195.00	1,673.00
05/22/2024	Reginald Sainvil	Develop and incorporate into the Disclosure Statement further disclosures regarding releases and classification and related correspondence.	2.30	1,195.00	2,748.50
05/23/2024	Maribel Fontanez	Run redlines of non voting notices; communicate with R. Sainvil regarding same.	0.40	465.00	186.00
05/23/2024	Mark Bloom	Planning for coordination of Chapter 11 and Dutch WHOA Plans (.3), and San Diego conferences with RESOR and Observer (1.8).	2.10	1,645.00	3,454.50
05/23/2024	Paul Keenan	Numerous correspondence and analysis regarding revisions to disclosure statement and schedule for confirmation of plan.	0.50	1,645.00	822.50
05/23/2024	Paul Keenan	Revising disclosure statement and order per comments of Court and US Trustee.	0.80	1,645.00	1,316.00



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05/23/2024	Paul Keenan	Correspondence, conferences and analysis regarding comments of court and US Trustee to disclosure statement, debtors' and third party releases, and order on DS and schedule.	1.30	1,645.00	2,138.50
05/23/2024	Paul Keenan	Conference call with R. Sainvil and others on Baker team regarding responses to comments of US Trustee to disclosure statement and order on same.	0.70	1,645.00	1,151.50
05/23/2024	Reginald Sainvil	Analyze and implement final changes to the plan, disclosure statement, and solicitation materials and numerous related correspondence.	3.10	1,195.00	3,704.50
05/24/2024	Maribel Fontanez	Update ballots for service.	0.40	465.00	186.00
05/24/2024	Maribel Fontanez	Prepare pdfs with final disclosure order, disclosure statement (with exhibits); communicate with R. Sainvil regarding same.	0.50	465.00	232.50
05/24/2024	Mark Bloom	Followup on Netherlands Dutch WHOA Plan and Brazil issues with bank lenders.	0.40	1,645.00	658.00
05/24/2024	Paul Keenan	Correspondence and analysis regarding entry of order approving disclosure statement.	0.60	1,645.00	987.00



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05/24/2024	Reginald Sainvil	Develop outline for confirmation brief.	0.90	1,195.00	1,075.50
05/24/2024	Reginald Sainvil	Address open items regarding solicitation commencement process and numerous related correspondence.	1.10	1,195.00	1,314.50
05/24/2024	Reginald Sainvil	Review, revise and finalize solicitation materials, including ballots, notices and letters.	2.10	1,195.00	2,509.50
05/28/2024	Mark Bloom	Drafting of response to RWeber email regarding status of bank remedies in Brazil and related issues as affect Brazil assets and WHOA Plan.	0.80	1,645.00	1,316.00
05/28/2024	Reginald Sainvil	Analyze solicitation procedures and manage solicitation commencement process.	1.00	1,195.00	1,195.00
05/29/2024	Mark Bloom	Coordination with Krijn on Chapter 11 Plan Effective Date, preservation of Dutch WHOA Plan, and exchange of emails with Riveron and RESOR teams regarding same.	0.70	1,645.00	1,151.50
05/29/2024	Paul Keenan	Analysis of calendar and items to complete before confirmation.	0.40	1,645.00	658.00
05/30/2024	Maribel Fontanez	Research confirmation briefs; communicate with R. Sainvil regarding same.	0.70	465.00	325.50
05/30/2024	Mark Bloom	Preparation for (.2) & participation in weekly telephone conference	1.10	1,645.00	1,809.50



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		with Observer, RESOR and Riveron teams regarding coordination of Chapter 11 and WHOA Plans (.7), and followup incl. telephone conference with Krijn regarding draft WHOA Plan and timing considerations, email from Observer regarding additional information (.2).			
05/30/2024	Paul Keenan	Conference with R. Sainvil regarding preparations for confirmation hearing.	0.40	1,645.00	658.00
05/31/2024	Maribel Fontanez	Commence working on confirmation brief.	0.90	465.00	418.50
05/31/2024	Mark Bloom	Exchange of emails and related followup with Krijn on WHOA Plan and Observer information requests.	0.20	1,645.00	329.00
05/31/2024	Paul Keenan	Correspondence and analysis regarding Mercon liquidation analysis.	0.40	1,645.00	658.00
05/31/2024	Paul Keenan	Conference with Resor and CDRO regarding Mercon BV liquidation analysis.	0.50	1,645.00	822.50
<b>Total Hours: 684.00</b>			<b>Total:</b>	<b>693,189.52 USD</b>	



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## Time Summary

### B100-Administration

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Federico Cuadra Del Carmen	39.50	1,345.00	53,127.50
Silvia Bernardino	0.70	685.00	479.50
<b>Total</b>	<b>B100-Administration</b>		<b>53,607.00</b>

### B110-Case Administration

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Gledson Marques de Campos	2.10	850.00	1,785.00
Lori Seavey	16.70	465.00	7,765.50
Maribel Fontanez	17.60	465.00	8,184.00
Paul Keenan	18.00	1,645.00	29,610.00
Reginald Sainvil	8.20	1,195.00	9,799.00
<b>Total</b>	<b>B110-Case Administration</b>		<b>57,143.50</b>

### B120-Asset Analysis and Recovery

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Oanh Nguyen	5.00	950.00	4,750.00
Paul Keenan	1.30	1,645.00	2,138.50
<b>Total</b>	<b>B120-Asset Analysis and Recovery</b>		<b>6,888.50</b>

### B130-Asset Disposition

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Cecilia Reategui	6.70	455.00	3,048.50
Federico Cuadra Del Carmen	13.10	1,345.00	17,619.50
Grace Blackburn	32.20	850.00	27,370.00
Hoang Anh Nguyen	6.80	480.00	3,264.00
Jonathan Susko	3.70	1,125.00	4,162.50
Lori Seavey	8.60	465.00	3,999.00
Maribel Fontanez	3.10	465.00	1,441.50
Paul Keenan	9.20	1,645.00	15,134.00
Phuoc Anh Tram Nguyen	49.10	280.00	13,748.00





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Reginald Sainvil	25.30	1,195.00	30,233.50
Silvia Bernardino	0.40	685.00	274.00
Steven Canner	0.20	1,645.00	329.00
Thi Thanh Hoa Dao	1.40	520.00	728.00
Thijs Bogaers	16.60	616.36	10,231.56
Tuan Minh Le	0.70	350.00	245.00
Zachary Bassen	50.50	750.00	37,875.00
<b>Total</b>		<b>B130-Asset Disposition</b>	<b>169,703.06</b>

**B140-Relief from Stay/Adequate Protection**

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Reginald Sainvil	1.40	1,195.00	1,673.00
<b>Total</b>		<b>B140-Relief from Stay/Adequate Protection</b>	<b>1,673.00</b>

**B150-Meetings of and Communications with Creditors**

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Paul Keenan	2.20	1,645.00	3,619.00
<b>Total</b>		<b>B150-Meetings of and Communications with Creditors</b>	<b>3,619.00</b>

**B160-Fee/Employment Applications**

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Lori Seavey	4.00	465.00	1,860.00
Mariana Conrado	1.10	545.00	599.50
Maribel Fontanez	33.50	465.00	15,577.50
Paul Keenan	0.60	1,645.00	987.00
Reginald Sainvil	3.10	1,195.00	3,704.50
<b>Total</b>		<b>B160-Fee/Employment Applications</b>	<b>22,728.50</b>

**B185-Assumption/Rejection of Leases and Contracts**

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Lori Seavey	1.30	465.00	604.50
Maribel Fontanez	0.80	465.00	372.00
Paul Keenan	0.40	1,645.00	658.00
Reginald Sainvil	2.40	1,195.00	2,868.00
<b>Total</b>		<b>B185-Assumption/Rejection of Leases and Contracts</b>	<b>4,502.50</b>



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#### **B190-Other Contested Matters**

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Eugenia Vazquez	2.00	508.23	1,016.46
Gledson Marques de Campos	4.80	850.00	4,080.00
John Dodd	0.20	1,345.00	269.00
Kim Tan	0.40	832.63	333.05
Mariana Conrado	1.70	545.00	926.50
Merredith Fong-Akan	4.20	297.37	1,248.95
Paul Keenan	18.50	1,645.00	30,432.50
Reginald Sainvil	2.50	1,195.00	2,987.50
Thais Barboza	4.80	335.00	1,608.00
Trung Nguyen Nguyen	0.70	200.00	140.00
<b>Total</b>	<b>B190-Other Contested Matters</b>		<b>43,041.96</b>

#### **B195-Non-Working Travel**

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Paul Keenan	6.00	822.50	4,935.00
<b>Total</b>	<b>B195-Non-Working Travel</b>		<b>4,935.00</b>

#### **B210-Business Operations**

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Matthew Smith	0.90	1,295.00	1,165.50
Silvia Bernardino	0.30	685.00	205.50
<b>Total</b>	<b>B210-Business Operations</b>		<b>1,371.00</b>

#### **B230-Financing/Cash Collateral**

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Kevin Whittam	0.50	1,345.00	672.50
Paul Keenan	3.40	1,645.00	5,593.00
<b>Total</b>	<b>B230-Financing/Cash Collateral</b>		<b>6,265.50</b>

#### **B310-Claims Administration and Objections**

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Paul Keenan	0.90	1,645.00	1,480.50
Reginald Sainvil	2.90	1,195.00	3,465.50
<b>Total</b>	<b>B310-Claims Administration and Objections</b>		<b>4,946.00</b>



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B320-Plan and Disclosure Statement			
Name	Hours	Rate	Amount
Annasofia Roig	6.30	895.00	5,638.50
John Dodd	2.60	1,345.00	3,497.00
Lori Seavey	12.20	465.00	5,673.00
Maribel Fontanez	11.50	465.00	5,347.50
Mark Bloom	32.00	1,645.00	52,640.00
Michael Matthiesen	4.20	670.00	2,814.00
Paul Keenan	67.60	1,645.00	111,202.00
Reginald Sainvil	105.40	1,195.00	125,953.00
Total	B320-Plan and Disclosure Statement		312,765.00
Total Hours	684.00	Total Fees	693,189.52 USD



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RE: Chapter 11 Cases

**Time Details**

**B100-Administration**

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
06/01/2024	Federico Cuadra Del Carmen	(1.3) Tend to various correspondence from Project Mocha, drafting updates and responses as required.	1.30	1,345.00	1,748.50
06/02/2024	Federico Cuadra Del Carmen	(1.1) Tend to emails from Project Mocha Team, drafting updates and responses as required.	1.10	1,345.00	1,479.50
06/03/2024	Federico Cuadra Del Carmen	(1.3) Tend to various correspondence from Project Mocha Team, drafting updates and responses as required; (0.5) Call with Mercon Management, Riveron and Baker Teams to discuss deal updates and open action items.	1.80	1,345.00	2,421.00
06/04/2024	Federico Cuadra Del Carmen	(2.9) Tend to numerous emails regarding questinos from from Project Mocha Tean, drafting updates and responses as required; (0.5) Call with minority shareholders to discuss transaction updates.	3.40	1,345.00	4,573.00
06/05/2024	Federico Cuadra Del Carmen	(1) Tend to various correspondence from Project Mocha Team, drafting updates and responses as required; (0.5) Call with Mercon	1.50	1,345.00	2,017.50



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		Management, Riveron and Baker Teams to discuss deal updates and open action items.			
06/06/2024	Federico Cuadra Del Carmen	(0.6) Tend to emails from Project Mocha Team on transaction, drafting updates and responses as required; (0.4) Call with Senior Creditors to discuss transaction updates.	1.00	1,345.00	1,345.00
06/07/2024	Federico Cuadra Del Carmen	(0.7) Tend to email correspondence from Project Mocha Team regarding latest transaction updates, drafting updates and responses as required; (0.5) Call with Mercon Management, Riveron and Baker Teams to discuss deal updates and open action items.	1.20	1,345.00	1,614.00
06/09/2024	Federico Cuadra Del Carmen	Tend to correspondence from Project Mocha, drafting updates and responses as required.	0.30	1,345.00	403.50
06/10/2024	Federico Cuadra Del Carmen	(0.7) Tend to correspondence from Project Mocha, drafting updates and responses as required; (0.5) Call with Mercon Management, Riveron and Baker Teams to discuss deal updates and open action items.	1.20	1,345.00	1,614.00



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06/11/2024	Federico Cuadra Del Carmen	Tend to correspondence from Project Mocha, drafting updates and responses as required.	0.60	1,345.00	807.00
06/12/2024	Federico Cuadra Del Carmen	(0.6) Tend to correspondence from Project Mocha, drafting updates and responses as required; (0.5) Call with Mercon Management, Riveron and Baker Teams to discuss deal updates and open action items.	1.10	1,345.00	1,479.50
06/13/2024	Federico Cuadra Del Carmen	(0.8) Tend to correspondence from Project Mocha, drafting updates and responses as required; (0.5) Call with Mercon Management, Riveron and Baker Teams to discuss deal updates and open action items; (0.3) Call with shareholders to discuss deal updates.	1.60	1,345.00	2,152.00
06/14/2024	Federico Cuadra Del Carmen	(1) Review and analyze correspondence from Project Mocha Team, drafting updates and responses as required; (0.5) Call with Senior Creditors to discuss transaction updates.	1.50	1,345.00	2,017.50
06/16/2024	Federico Cuadra Del Carmen	Review and analyze emails from Project Mocha Team on recent events, drafting updates and responses	0.40	1,345.00	538.00



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		as required.			
06/17/2024	Federico Cuadra Del Carmen	(0.7) Tend to emails from Project Mocha Team, drafting updates and responses as required; (0.4) Call with Mercon Management, Riveron and Baker Teams to discuss deal updates and open action items.	1.10	1,345.00	1,479.50
06/18/2024	Federico Cuadra Del Carmen	(0.5) Review correspondence from Project Mocha transactional team, drafting updates and responses as required; (0.5) Call with Mercon Management, Riveron and Baker Teams to discuss deal updates and open action items.	1.00	1,345.00	1,345.00
06/19/2024	Federico Cuadra Del Carmen	Review email correspondence from Project Mocha, drafting updates and responses as required.	0.70	1,345.00	941.50
06/20/2024	Federico Cuadra Del Carmen	(0.9) Analyze correspondence from Project Mocha transactional team, drafting updates and responses as required; (0.2) Review proxy prepared by T. Bogaers regarding the authorization of S. Stemmler's Termination Agreement; (0.5) Call with Senior Lenders to discuss transaction	1.60	1,345.00	2,152.00



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		updates.			
06/21/2024	Federico Cuadra Del Carmen	(.7) Tend to correspondence from Project Mocha, drafting updates and responses as required; (0.5) Call with Mercon Management, Riveron and Baker Teams to discuss deal updates and open action items.	1.20	1,345.00	1,614.00
06/23/2024	Federico Cuadra Del Carmen	Review and analyze email correspondence from Project Mocha Transactional Team, drafting updates and responses as required.	0.50	1,345.00	672.50
06/24/2024	Federico Cuadra Del Carmen	(0.8) Review emails from Project Mocha Team, drafting updates and responses as required; (0.5) Call with Mercon Management, Riveron and Baker Teams to discuss deal updates and open action items.	1.30	1,345.00	1,748.50
06/25/2024	Federico Cuadra Del Carmen	(0.8) Review and analyze email correspondence from Project Mocha deal team, drafting updates and responses as required regarding project progress.	0.80	1,345.00	1,076.00
06/26/2024	Federico Cuadra Del Carmen	(0.6) Tend to correspondence from Project Mocha, drafting updates and responses as required.	0.60	1,345.00	807.00





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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
06/27/2024	Federico Cuadra Del Carmen	(0.7) Review and analyze email correspondence from Project Mocha Transaction Team, drafting updates and responses as required regarding transaction progress; (0.2) Call with Senior Lenders to discuss transaction updates.	0.90	1,345.00	1,210.50
06/28/2024	Federico Cuadra Del Carmen	(0.7) Review emails from Project Mocha transaction team, drafting updates and responses as required; (0.3) Attend Confirmation Hearing.	1.00	1,345.00	1,345.00
06/29/2024	Federico Cuadra Del Carmen	(0.3) Tend to correspondence from Project Mocha Transational Team, drafting updates and responses as required regarding project questions;	0.30	1,345.00	403.50

**B110-Case Administration**

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
06/03/2024	Lori Seavey	Review latest case filings and update case calendar and WIP (1.2); circulate to Baker team (.2).	1.40	465.00	651.00
06/03/2024	Maribel Fontanez	Review WIP/ Calendar; update calendar accordingly.	0.90	465.00	418.50
06/05/2024	Paul Keenan	Conference with CRO and senior management team (.4); follow up	0.70	1,645.00	1,151.50



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
06/05/2024	Paul Keenan	regarding issues raised in meeting (.3). Correspondence and analysis regarding required financial reporting.	0.40	1,645.00	658.00
06/06/2024	Paul Keenan	Conference with Rabobank and bank syndicate regarding update on case.	0.50	1,645.00	822.50
06/07/2024	Paul Keenan	Conference with senior management team and CRO.	0.50	1,645.00	822.50
06/10/2024	Lori Seavey	Review court docket and draft agenda for 6/13 hearing (.5); review docket and update case WIP and calendar (.9).	1.40	465.00	651.00
06/10/2024	Maribel Fontanez	Coordinate P. Keenan and R. Sainvil appearance at 06/13/2024 hearing.	0.10	465.00	46.50
06/10/2024	Maribel Fontanez	Review updated WIP/Calendar; update calendar accordingly.	0.10	465.00	46.50
06/10/2024	Paul Keenan	Conference with CRO and senior management team.	0.40	1,645.00	658.00
06/10/2024	Reginald Sainvil	Strategy conference with P. Keenan, R. Weber, A. Cole, and H. Light regarding plan issues, lift stay issues, and insurance issues.	1.00	1,195.00	1,195.00
06/11/2024	Reginald Sainvil	Telephone conference with H. Light regarding redactions issue.	0.20	1,195.00	239.00
06/11/2024	Reginald Sainvil	Telephone conference with H. Light regarding retention plan.	0.20	1,195.00	239.00
06/12/2024	Lori Seavey	Emails with R. Sainvil	0.80	465.00	372.00



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		regarding cancelled hearing and draft cancellation notice (.4); review entered order on omnibus accounts receivable settlement and email to chambers re incorrect uploaded image for same (.1); attend to filing notice of cancelled hearing and email notice to chambers and Kroll (.3).			
06/12/2024	Paul Keenan	Conference with CRO and senior management team.	0.50	1,645.00	822.50
06/13/2024	Maribel Fontanez	Finalize, e-file and process for service monthly operating reports.	0.90	465.00	418.50
06/13/2024	Paul Keenan	Conference with Lenders and CWT.	0.50	1,645.00	822.50
06/14/2024	Lori Seavey	Review latest case filings and update case calendar and WIP re same (.6).	0.60	465.00	279.00
06/14/2024	Maribel Fontanez	Finalize, e-file and process for service amended MORs for Mercon Brasil for Feb. and March 2024.	0.50	465.00	232.50
06/14/2024	Paul Keenan	Conference with CRO and senior management team and follow up regarding same.	0.50	1,645.00	822.50
06/15/2024	Lori Seavey	Review latest filings and Baker communications and update case calendar re same and circulate calendar to Baker team (.5).	0.50	465.00	232.50



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
06/17/2024	Lori Seavey	Review U.S. Trustee docket entry on continued 341 meeting and revise case calendar	0.20	465.00	93.00
06/17/2024	Maribel Fontanez	Review WIP and Calendar; update calendar accordingly.	0.20	465.00	93.00
06/17/2024	Paul Keenan	Conference with CRO and senior management team.	0.50	1,645.00	822.50
06/18/2024	Maribel Fontanez	Prepare shell for Light Declaration ISO Motion to Redact.	0.40	465.00	186.00
06/18/2024	Paul Keenan	Correspondence and analysis regarding various insurance matters.	0.40	1,645.00	658.00
06/21/2024	Maribel Fontanez	Commence preparing agenda for 06.28.2024 hearing.	0.80	465.00	372.00
06/21/2024	Maribel Fontanez	Finalize and e-file MORs and Periodic Report.	1.20	465.00	558.00
06/24/2024	Lori Seavey	Emails with NY reception and B. Cahn regarding hearing prep (.2).	0.20	465.00	93.00
06/24/2024	Maribel Fontanez	Finalize and e-file various MORs.	0.50	465.00	232.50
06/24/2024	Maribel Fontanez	Review docket to confirm all MORs have been filed; prepare chart with DE no.; communicate with R. Sainvil regarding same.	0.90	465.00	418.50
06/24/2024	Maribel Fontanez	Update agenda for 06.28.2024 hearing.	0.20	465.00	93.00
06/24/2024	Paul Keenan	Conference with CRO and senior management team.	0.40	1,645.00	658.00
06/25/2024	Lori Seavey	Review latest filings and update case calendar (.4).	0.40	465.00	186.00



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
06/25/2024	Maribel Fontanez	Prepare notice of filing unredacted Schedule 3 to Light Amended Declaration.	0.50	465.00	232.50
06/25/2024	Reginald Sainvil	Prepare for 341 meeting.	0.50	1,195.00	597.50
06/26/2024	Maribel Fontanez	Update assumption schedule; communicate with R. Sainvil regarding same.	0.50	465.00	232.50
06/26/2024	Maribel Fontanez	Arrange for the appearance of numerous parties at confirmation hearing.	1.30	465.00	604.50
06/27/2024	Lori Seavey	Receive notice of filing related to redactions motion and prepare for filing (.5); receive final and attend to filing (.2); email Kroll re: service (.1).	0.80	465.00	372.00
06/27/2024	Maribel Fontanez	Update redaction information in amended schedule 3.	0.40	465.00	186.00
06/28/2024	Lori Seavey	Review recent filings and update case calendar and WIP re same (.7).	0.70	465.00	325.50
06/28/2024	Maribel Fontanez	Draft order deeming redactions moot.	0.30	465.00	139.50

**B120-Asset Analysis and Recovery**

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
06/04/2024	Oanh Nguyen	Correspond with F. Cuadra del Carmen regarding opening an account for paying to Biju (.4); correspond with Zach regarding closing and document deliver (.4).	0.80	950.00	760.00
06/07/2024	Paul Keenan	Correspondence and analysis regarding	0.30	1,645.00	493.50



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
06/14/2024	Paul Keenan	wind down of foreign subsidiaries. Correspondence and analysis regarding insurance claims review.	0.30	1,645.00	493.50

**B130-Asset Disposition**

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
06/01/2024	Federico Cuadra Del Carmen	(0.6) Call with CWT and DPW to discuss questions on intercompany assignment and assumption agreement; (5.2) Tend to VN Closing preparations regarding open action items on Closing Checklist and related transaction documents; Negotiate open items in transaction documents with Buyer counsel.	5.80	1,345.00	7,801.00
06/01/2024	Steven Canner	Update email regarding closing/regulatory matters.	0.20	1,645.00	329.00
06/01/2024	Zachary Bassen	Calls with BM Netherlands, counsel to Purchaser and counsel to RaboBank to finalize assignment agreements relating to intercompany receivables (.8); review and revise closing checklist (.4); prepare closing punchlist (.4); review revised side letter (.2); attend to other closing matters (.4).	2.20	750.00	1,650.00
06/02/2024	Federico Cuadra Del Carmen	(4.0) Tend to VN Closing preparations;	6.30	1,345.00	8,473.50



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		(.5) review open action items on Closing Checklist to identify pending items; (.5) review updates to closing transaction documents; (1.3) negotiate remaining open items with Buyer's counsel.			
06/02/2024	Hoang Anh Nguyen	Review relevant information (.6) and prepare responses on offer letter with new legal representative of VN entities (.6) and work permit procedures applicable to him (.9).	2.10	480.00	1,008.00
06/02/2024	Paul Keenan	Correspondence and analysis regarding closing and transition of sale of Vietnam business.	0.40	1,645.00	658.00
06/02/2024	Phuoc Anh Tram Nguyen	Respond to questions registration of Alex as the legal representative of the VN companies.	0.30	280.00	84.00
06/02/2024	Phuoc Anh Tram Nguyen	Review comments on the employment of Alex (0.4); discuss with Nguyen Hoang Anh on the same (0.2); update the comments per the discussion with Nguyen Hoang Anh (0.3); clean up and send out the same (0.3).	1.20	280.00	336.00
06/02/2024	Sanny Doan	Review work permit process for A. Casserly (legal rep)	0.70	300.00	210.00



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
06/02/2024	Zachary Bassen	(.4); prepare comments on same for compliance with Vietnamese law (.3). Attend to closing matters for Vietnam sale including reviewing and revising side letter (1.2), reviewing and revising funds flow (.5); coordinating timing of closing (.5); preparing final executed documents and other closing matters (1.7).	3.90	750.00	2,925.00
06/03/2024	Federico Cuadra Del Carmen	(3.2) Review final Closing Checklist Items with Buyer and Seller Teams; (1.2) Finalize open items in transaction documents for closing; (.9) Tend to VN Closing preparations; (.5) Call with Mercon Team to address remaining questions and autorizations for closing; (0.4) Call with R&Co to discuss questions from DPW on purchase price adjustment.	6.20	1,345.00	8,339.00
06/03/2024	Paul Keenan	Correspondence and analysis regarding closing on sale of Brazilian assets.	0.40	1,645.00	658.00
06/03/2024	Paul Keenan	Multiple correspondence and analysis regarding closing on and transfer of sale of Vietnam business.	0.40	1,645.00	658.00





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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
06/03/2024	Paul Keenan	Conference with F Cuadra regarding closing on Vietnam sale and transfer of assets.	0.30	1,645.00	493.50
06/03/2024	Phuoc Anh Tram Nguyen	Check and receive the chops and tax tokens of the VN companies handed over by Bui Thu Thuy (Mercafe Vietnam).	0.60	280.00	168.00
06/03/2024	Phuoc Anh Tram Nguyen	Review the documents to be sent to MB and Agribank as attached in an email from Biju Nair (0.7); prepare a summary of the same for BM US team (0.4).	1.10	280.00	308.00
06/03/2024	Phuoc Anh Tram Nguyen	Prepare the delivery note for handing over the chops and tax tokens of the VN companies to the buyer.	0.40	280.00	112.00
06/03/2024	Steven Canner	Call with F. del Carmen Cuadra regarding employee issue.	0.20	1,645.00	329.00
06/03/2024	Zachary Bassen	Further attention to closing matters for the Vietnam sale including reviewing and revising side letter (.3); reviewing and revising funds flow (.2); coordinating timing of closing (.2); preparing final executed documents and other closing matters (.3).	1.00	750.00	750.00
06/03/2024	Zachary Bassen	Attend to closing matters for the Vietnam sale including reviewing	6.20	750.00	4,650.00



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06/04/2024	Paul Keenan	and revising side letter (1.2); reviewing and revising funds flow (1.0); coordinating timing of closing (.5); preparing final executed documents and other closing matters (3.5). Numerous correspondence regarding closing on sale of assets in Brazil.	0.40	1,645.00	658.00
06/04/2024	Paul Keenan	Numerous correspondence regarding closing on sale and transfer of assets for Vietnam business.	0.50	1,645.00	822.50
06/04/2024	Phuoc Anh Tram Nguyen	Arrange with KPMG and the buyer for the delivery of the chops and tax tokens of the VN companies to the buyer.	0.50	280.00	140.00
06/04/2024	Zachary Bassen	Attend to closing matters for the Vietnam sale including reviewing and revising side letter (.2); reviewing and revising funds flow (.3); coordinating timing of closing (.1); preparing final executed documents and other closing matters (1.1).	1.70	750.00	1,275.00
06/04/2024	Zachary Bassen	Attend to closing matters for the Vietnam sale including reviewing and revising side letter (.2); reviewing and revising funds flow	1.00	750.00	750.00



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		(.2); coordinating timing of closing (.2); preparing final executed documents and other closing matters (.4).			
06/04/2024	Zachary Bethel	Attach signature pages to their corresponding documents and add correct date of closing for sales of American and Vietnamese assets.	1.90	485.00	921.50
06/05/2024	Grace Blackburn	Assist and consider question with respect to cash flow from C. Suarez	0.30	850.00	255.00
06/05/2024	Paul Keenan	Multiple correspondence regarding closing of sale of Vietnamese business.	0.40	1,645.00	658.00
06/05/2024	Paul Keenan	Multiple correspondence regarding closing of sale of Brazilian assets.	0.30	1,645.00	493.50
06/05/2024	Paul Keenan	Correspondence and analysis regarding closing on sale of Brazilian assets.	0.30	1,645.00	493.50
06/05/2024	Thijs Bogaers	Correspondences with client and Baker Team regarding the legalization of certain documents up to and including the Vietnamese Embassy.	0.40	613.36	245.34
06/05/2024	Zachary Bassen	Compile closing documents for Vietnam sale (.3); coordinate closing of Brazil sale (.4).	0.70	750.00	525.00
06/05/2024	Zachary Bethel	Compile documents and signatures for assignment of	0.30	485.00	145.50



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06/06/2024	Paul Keenan	Brazilian coffee contracts. Numerous correspondence regarding issues arising under closing of sale of Brazilian assets.	0.40	1,645.00	658.00
06/06/2024	Thijs Bogaers	Correspondences with client and Baker Team regarding the legalization of certain documents up to and including the Vietnamese Embassy.	0.40	613.36	245.34
06/06/2024	Zachary Bassen	Attend to closing of Brazil barter contracts sale.	0.20	750.00	150.00
06/06/2024	Zachary Bethel	Stitch closing documents together for sale of assets in Brazil.	0.80	485.00	388.00
06/07/2024	Federico Cuadra Del Carmen	Review Data Transfer Agreement provided by Sucafina, drafting updates and revisions as required.	1.20	1,345.00	1,614.00
06/07/2024	Grace Blackburn	Progress closing bible.	0.30	850.00	255.00
06/07/2024	Thijs Bogaers	Correspondences with client and Baker Team regarding the legalization of certain documents up to and including the Vietnamese Embassy.	0.30	613.36	184.01
06/07/2024	Zachary Bassen	Prepare closing set of documents.	0.20	750.00	150.00
06/09/2024	Federico Cuadra Del Carmen	Draft updates to the DTA based on input from F. Cam.	0.30	1,345.00	403.50
06/11/2024	Adam Aft	Review, analyze, and revise License Agreement.	0.80	1,225.00	980.00



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06/11/2024	Federico Cuadra Del Carmen	Draft updates to the DTA based on feedback from F. Cam and A. Aft.	0.40	1,345.00	538.00
06/11/2024	Hoang Anh Nguyen	Prepare confirmation letter on termination payments for bank transfer purpose.	1.60	480.00	768.00
06/12/2024	Federico Cuadra Del Carmen	Review updates to the DTA from Sucafina, draft summary for H. Light and A. Morely.	0.30	1,345.00	403.50
06/12/2024	Thijs Bogaers	Correspondences with client and Baker Team regarding the legalization of certain documents up to and including the Vietnamese Embassy.	0.30	613.36	184.01
06/13/2024	Federico Cuadra Del Carmen	Draft final updates to the Data Transfer Agreement based on input provided by H. Light and A. Morely.	0.40	1,345.00	538.00
06/14/2024	Hoang Anh Nguyen	Prepare simple-form mutual separation agreement with Director of Mercafe Agri for bank transfer purpose.	2.10	480.00	1,008.00
06/17/2024	Phuoc Anh Tram Nguyen	Prepare response to questions from emails of Cuadra Del Carmen, Federico regarding the registration of the new legal representative of the Vietnamese companies.	0.70	280.00	196.00
06/18/2024	Federico Cuadra Del Carmen	Call with A. Morley to discuss proposed purchase price adjustments from	0.30	1,345.00	403.50



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		Vietnam Purchaser.			
06/18/2024	Zachary Bassen	Prepare closing binder for USA, Brazil and Vietnam sales.	0.20	750.00	150.00
06/19/2024	Federico Cuadra Del Carmen	Call with H. Light and A. Morley regarding Vietnam Purchaser purchase price adjustment requests.	0.20	1,345.00	269.00
06/20/2024	Annika Thorelli	Prepared closing binder index for USA, Brazil and Vietnam.	2.60	470.00	1,222.00
06/20/2024	Zachary Bassen	Call with Rothschild to confirm process for obtaining VDR copies.	0.20	750.00	150.00
06/21/2024	Annika Thorelli	Compiled documents for Closing Binder.	0.30	470.00	141.00
06/21/2024	Maribel Fontanez	Retrieve documents regarding sales (.3); communicate with R. Sainvil and Z. Bassen regarding same (.2).	0.50	465.00	232.50
06/21/2024	Zachary Bassen	Review and revise closing binders for USA, Vietnam and Brazil sales.	0.80	750.00	600.00
06/22/2024	Reginald Sainvil	Analyze AR Analysis Report.	0.30	1,195.00	358.50
06/24/2024	Annika Thorelli	Implemented revisions to index.	0.20	470.00	94.00
06/24/2024	Zachary Bassen	Review and revise closing binders.	0.30	750.00	225.00
06/25/2024	Annika Thorelli	Completed closing binder for StoneX Transaction.	0.80	470.00	376.00
06/25/2024	Zachary Bassen	Review and revise closing set for StoneX sales (.3); coordinate professional fee escrow with Citi (.3).	0.60	750.00	450.00
06/27/2024	Zachary Bassen	Review SPA requirements for notice of	0.40	750.00	300.00



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06/29/2024	Zachary Bassen	disagreement/ agreement; review professional service escrow. Review and revise professional fees escrow agreement.	1.50	750.00	1,125.00
<b>B140-Relief from Stay/Adequate Protection</b>					
06/02/2024	Reginald Sainvil	Analyze and develop outline regarding discovery in connection with stay relief issues.	2.30	1,195.00	2,748.50
06/03/2024	Lori Seavey	Emails with R. Sainvil regarding response to motion for relief from stay (.2); review motion and draft shell for response to motion for relief from stay (1.1).	1.30	465.00	604.50
06/03/2024	Maribel Fontanez	Submit parties who filed motion for relief from stay to intake for conflicts review; communicate with R. Sainvil regarding same.	0.30	465.00	139.50
06/03/2024	Reginald Sainvil	Telephone conference with insurer counsel regarding motion for relief from stay.	0.50	1,195.00	597.50
06/03/2024	Reginald Sainvil	Preparation of opposition response to insurer stay relief motion.	3.20	1,195.00	3,824.00
06/04/2024	Reginald Sainvil	Analyze and further develop proposed resolution of insurer stay relief motion.	1.40	1,195.00	1,673.00
06/05/2024	Reginald Sainvil	Prepare analysis regarding stay relief	0.80	1,195.00	956.00



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06/10/2024	Paul Keenan	issues and related correspondence. Conference with CRO regarding motions for stay relief.	0.90	1,645.00	1,480.50
06/11/2024	Reginald Sainvil	Prepare analysis regarding relief from stay and impact of insurance neutrality opinion.	0.90	1,195.00	1,075.50
06/14/2024	Reginald Sainvil	Correspondence with CRO regarding stay relief issues.	0.20	1,195.00	239.00

**B160-Fee/Employment Applications**

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
06/03/2024	Maribel Fontanez	Finalize and e-file supplemental declaration to application to employ Riveron (.3); finalize and e-file supplement to Baker first interim fee application (.3).	0.60	465.00	279.00
06/04/2024	Maribel Fontanez	Commence drafting Baker April monthly fee statement.	2.30	465.00	1,069.50
06/05/2024	Maribel Fontanez	Prepare third supplement to OCP list; communicate with R. Sainvil regarding same.	0.20	465.00	93.00
06/06/2024	Maribel Fontanez	Prepare GSX monthly fee statements for April and May (.5); communicate with R. Sainvil regarding same (.1).	0.60	465.00	279.00
06/06/2024	Maribel Fontanez	Draft sixth monthly fee statement.	1.30	465.00	604.50
06/06/2024	Maribel Fontanez	Continue drafting Baker fifth monthly fee statement.	1.60	465.00	744.00
06/06/2024	Maribel Fontanez	Finalize and e-file third supplement to	0.30	465.00	139.50





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		OCP list; communicate with R. Sainvil regarding same.			
06/07/2024	Maribel Fontanez	Retrieve and review supporting documentation for GSX monthly fee statement.	0.20	465.00	93.00
06/07/2024	Maribel Fontanez	Finalize, e-file and process for service Baker fifth monthly fee statement.	0.30	465.00	139.50
06/07/2024	Maribel Fontanez	Finalize, e-file and process for service draft Baker May fee statement (1.7); communicate with P. Keenan regarding same (.2).	1.90	465.00	883.50
06/14/2024	John Dodd	Call with R. Sainvil regarding H. Walsh fee application.	0.20	1,345.00	269.00
06/14/2024	Lori Seavey	Emails with R. Sainvil regarding Baker retention order and declaration (.1); draft supplemental declaration (.3); emails regarding rate adjustments (.1).	0.50	465.00	232.50
06/14/2024	Maribel Fontanez	Finalize, e-file and process for service GSX fifth and sixth monthly fee statements.	0.50	465.00	232.50
06/14/2024	Maribel Fontanez	Prepare fourth supplement to OCP list; communicate with R. Sainvil regarding same.	0.20	465.00	93.00
06/14/2024	Maribel Fontanez	Update OCP list.	1.00	465.00	465.00
06/14/2024	Maribel Fontanez	Finalize draft April (.6) and May (.5)	1.10	465.00	511.50



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		monthly fee statements for RESOR.			
06/14/2024	Reginald Sainvil	Correspondence regarding ordinary course professional issues.	0.30	1,195.00	358.50
06/17/2024	Maribel Fontanez	Update 4th supplement to OCP list; communicate with R. Sainvil regarding same.	0.20	465.00	93.00
06/18/2024	Maribel Fontanez	Finalize, e-file and process for service Fourth Supplement to OCP List; communicate with R. Sainvil regarding same.	0.30	465.00	139.50
06/21/2024	Maribel Fontanez	Review docket for objections to monthly fee statements; communicate with R. Sainvil regarding same.	0.40	465.00	186.00
06/22/2024	Maribel Fontanez	Further updates to draft first interim fee app order.	0.90	465.00	418.50
06/22/2024	Maribel Fontanez	Prepare draft first interim fee app order.	0.80	465.00	372.00
06/24/2024	Maribel Fontanez	Communicate with M. Marambio Calvo regarding April fee statements.	0.10	465.00	46.50
06/24/2024	Maribel Fontanez	Prepare certificate of no response to fee applications.	0.50	465.00	232.50
06/24/2024	Maribel Fontanez	Prepare, finalize, e-file and process for service sixth monthly Riveron fee statement.	0.40	465.00	186.00
06/24/2024	Maribel Fontanez	Updated first interim fee order(.8); communicated with R.	1.00	465.00	465.00



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06/24/2024	Maribel Fontanez	Sainvil and J. Dodd regarding same (.2). Research fee orders.	0.40	465.00	186.00
06/25/2024	Lori Seavey	Emails with R. Sainvil and J. Kaplan re: billing guidelines (.2).	0.20	465.00	93.00
06/26/2024	John Dodd	Call with A. Greenberg regarding form of Interim Fee Order (.1); final review and comment regarding draft CNO and form of Interim Fee Order (.2).	0.30	1,345.00	403.50
06/26/2024	Lori Seavey	Review CNO and proposed order approving first interim fee applications to prepare for filing (.7); emails with R. Sainvil re same (.1); attend to efilng CNO and email of proposed order to chambers (.2); telephone call and emails with R. Sainvil regarding UST service (.2).	1.20	465.00	558.00
06/28/2024	Lori Seavey	Emails with R. Sainvil regarding interim fee order draft and delivery to chambers at conclusion of hearing.	0.20	465.00	93.00
06/28/2024	Maribel Fontanez	Commence preparing RESOR first and final fee application.	1.00	465.00	465.00
<b>B170-Fee/Employment Objections</b>					
<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
06/11/2024	Maribel Fontanez	Review UST objections to Baker fee app (.2); prepare excel spreadsheet of	0.70	465.00	325.50



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		same (.4); communicate with J. Dodd regarding same (.1).			
06/12/2024	Maribel Fontanez	Update spreadsheet with expenses objected to by UST; communicate with J. Dodd regarding same.	0.40	465.00	186.00
06/24/2024	Maribel Fontanez	Calculate percentage of proposed UST holdback amount; communicate with J. Dodd regarding same.	0.40	465.00	186.00
<b>B185-Assumption/Rejection of Leases and Contracts</b>					
<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/21/2024	Adam Aft	Review and analyze IP disposition and related terms.	0.30	1,225.00	367.50
06/01/2024	Thijs Bogaers	Multiple calls with F. Cuadra Del Carmen and Z. Bassen (BM US) regarding the finalization of the Assignment and Assumption Agreements.	0.70	613.36	429.35
06/21/2024	Lori Seavey	Review order on Debtors' Fourth omnibus rejection of contracts and calculate deadline; update case calendar re recent filings (.3).	0.30	465.00	139.50
<b>B190-Other Contested Matters</b>					
<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
06/03/2024	Mariana Conrado	Review the updated court copies of the case to verify possible measures to be taken on it; conference with TBarboza to instruct her on the measures to	0.30	545.00	163.50



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06/03/2024	Paul Keenan	be taken in Court, considering the possible deadline involving an internal appeal. Conference with senior management team and CRO regarding status of WHOA proceeding.	0.80	1,645.00	1,316.00
06/03/2024	Paul Keenan	Additional communications with counsel for Rabo and UCC regarding WHOA proceeding.	0.30	1,645.00	493.50
06/03/2024	Paul Keenan	Conference with Resor, and counsel for Rabo and UCC, regarding status of WHOA proceeding.	0.80	1,645.00	1,316.00
06/03/2024	Thais Barboza	Daily analysis of the updated court records in order to verify possible measures to be taken on it, as requested by M. Conrado.	0.50	335.00	167.50
06/04/2024	Mariana Conrado	Review the updated court copies of the case to verify possible measures to be taken on it.	0.20	545.00	109.00
06/04/2024	Thais Barboza	Daily analysis of the updated court records in order to verify possible measures to be taken on it, as requested by M. Conrado.	0.30	335.00	100.50
06/04/2024	Thijs Bogaers	Review the queries from client regarding the execution of the Settlement Agreement by Mercon B.V., includes	0.20	613.36	122.67



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		correspondences with F. Cuadra Del Carmen (BM US) regarding the same.			
06/05/2024	Gledson Marques de Campos	Review the decision issued in the appeal filed and analyze the answer presented.	1.30	850.00	1,105.00
06/05/2024	Paul Keenan	Lengthy and multiple correspondence with Resor regarding status of WHOA proceeding.	0.80	1,645.00	1,316.00
06/05/2024	Reginald Sainvil	Prepare analysis regarding redaction and/or sealing of certain names in light of safety concerns.	2.60	1,195.00	3,107.00
06/05/2024	Thais Barboza	Daily analysis of the updated court records in order to verify possible measures to be taken on it, as requested by M. Conrado.	0.20	335.00	67.00
06/06/2024	Merredith Fong-Akan	Send two legalized decisions and a power of attorney of Mercon B.V. per e-mail and per courier to T. T. Thinh.	0.50	295.92	147.96
06/06/2024	Paul Keenan	Conference with Resor and Dutch Observer's legal counsel regarding issues arising under WHOA proceeding.	1.00	1,645.00	1,645.00
06/06/2024	Paul Keenan	Numerous correspondence and analysis regarding issues arising under WHOA proceeding.	0.40	1,645.00	658.00
06/06/2024	Paul Keenan	Conference call with counsel for Rabo regarding WHOA proceeding.	0.30	1,645.00	493.50



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06/06/2024	Paul Keenan	Multiple correspondence regarding status of recognition proceeding in Brazil.	0.30	1,645.00	493.50
06/06/2024	Thais Barboza	Daily analysis of the updated court records in order to verify possible measures to be taken on it, as requested by M. Conrado.	0.20	335.00	67.00
06/07/2024	Mariana Conrado	Review the updated court copies of the case to verify possible measures to be taken on it (.2); exchange emails with USA team to inform them on the status of the case (.2).	0.40	545.00	218.00
06/07/2024	Paul Keenan	Analysis with CRO of potential claims in Nicaragua.	0.40	1,645.00	658.00
06/07/2024	Paul Keenan	Brief analysis of draft report by Dutch Observer.	0.40	1,645.00	658.00
06/07/2024	Thais Barboza	Daily analysis of the updated court records in order to verify possible measures to be taken on it, as requested by M. Conrado.	0.30	335.00	100.50
06/09/2024	Reginald Sainvil	Analyze draft settlement agreement and determine most practical approach to implement the proposed settlement terms.	0.70	1,195.00	836.50
06/10/2024	Mariana Conrado	Exchange emails with Demarest team to confirm if they have align with the team in the USA the filing of	0.20	545.00	109.00



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		internal appeal against the decision issued by the reporting judge of the appeal.			
06/10/2024	Paul Keenan	Conference with CRO regarding status of WHOA proceeding.	0.20	1,645.00	329.00
06/10/2024	Thais Barboza	Daily analysis of the updated court records in order to verify possible measures to be taken on it, as requested by M. Conrado.	0.20	335.00	67.00
06/11/2024	Paul Keenan	Conference call with CRO regarding status of WHOA proceeding.	0.20	1,645.00	329.00
06/11/2024	Paul Keenan	Conference call with UCC regarding WHOA.	0.50	1,645.00	822.50
06/11/2024	Thais Barboza	Daily analysis of the updated court records in order to verify possible measures to be taken on it, as requested by M. Conrado.	0.20	335.00	67.00
06/12/2024	Thais Barboza	Daily analysis of the updated court records in order to verify possible measures to be taken on it, as requested by M. Conrado.	0.30	335.00	100.50
06/13/2024	Mariana Conrado	Review the updated court copies of the case to verify possible measures to be taken on it (.4); review the translations of the last briefs filed in the case (.3); exchange emails with USA's team to inform them on the last developments of	1.30	545.00	708.50





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		the case and to send to them the translations of the last briefs filed in the case (.3); conference with RSainvil to discuss the fees proposals sent by Vinicius and by Demarest and to discuss their scope (.3).			
06/13/2024	Thais Barboza	Daily analysis of the updated court records in order to verify possible measures to be taken on it, as requested by M. Conrado.	0.30	335.00	100.50
06/14/2024	Paul Keenan	Correspondence and analysis regarding status litigation in Brazil.	0.30	1,645.00	493.50
06/14/2024	Thais Barboza	Daily analysis of the updated court records in order to verify possible measures to be taken on it, as requested by M. Conrado.	0.30	335.00	100.50
06/17/2024	Thais Barboza	Daily analysis of the updated court records in order to verify possible measures to be taken on it, as requested by M. Conrado.	0.20	335.00	67.00
06/18/2024	Thais Barboza	Daily analysis of the updated court records in order to verify possible measures to be taken on it, as requested by M. Conrado.	0.30	335.00	100.50
06/19/2024	Mariana Conrado	Review the updated court copies of the	0.20	545.00	109.00



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06/19/2024	Thais Barboza	case to verify possible measures to be taken on it. Daily analysis of the updated court records in order to verify possible measures to be taken on it, as requested by M. Conrado.	0.20	335.00	67.00
06/20/2024	Thais Barboza	Daily analysis of the updated court records in order to verify possible measures to be taken on it, as requested by M. Conrado.	0.20	335.00	67.00
06/21/2024	Thais Barboza	Daily analysis of the updated court records in order to verify possible measures to be taken on it, as requested by M. Conrado.	0.20	335.00	67.00
06/23/2024	John Dodd	Review draft common interest agreement for liquidating trustee (.2); review draft protective order regarding application to future liquidating trustee (.2); correspond with Rabo's counsel regarding same (.1).	0.50	1,345.00	672.50
06/24/2024	Paul Keenan	Numerous correspondence regarding status of WHOA proceeding and other issues in the Netherlands.	0.60	1,645.00	987.00
06/24/2024	Reginald Sainvil	Analyze redaction request (.4), UST response (.4), and consider mechanisms	1.80	1,195.00	2,151.00



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06/24/2024	Thais Barboza	for potential resolution (1.0). Daily analysis of the updated court records in order to verify possible measures to be taken on it, as requested by M. Conrado.	0.20	335.00	67.00
06/25/2024	Reginald Sainvil	Analyze potential mechanics for resolution of US objection to redactions.	0.80	1,195.00	956.00
06/25/2024	Thais Barboza	Daily analysis of the updated court records in order to verify possible measures to be taken on it, as requested by M. Conrado.	0.20	335.00	67.00
06/26/2024	Reginald Sainvil	Prepare notice and amendments to resolve UST objections to redactions.	1.30	1,195.00	1,553.50
06/26/2024	Reginald Sainvil	Correspondence with the UST regarding resolution of redaction issues.	0.20	1,195.00	239.00
06/26/2024	Thais Barboza	Daily analysis of the updated court records in order to verify possible measures to be taken on it, as requested by M. Conrado.	0.20	335.00	67.00
06/27/2024	Thais Barboza	Daily analysis of the updated court records in order to verify possible measures to be taken on it, as requested by M. Conrado.	0.20	335.00	67.00
06/28/2024	Thais Barboza	Daily analysis of the updated court records	0.30	335.00	100.50



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		in order to verify possible measures to be taken on it, as requested by M. Conrado.			
<b>B195-Non-Working Travel</b>					
<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
06/24/2024	John Dodd	Travel from Florida to New York for Mercon Confirmation Hearing.	3.40	672.50	2,286.50
06/28/2024	John Dodd	Travel from New York to Florida following Confirmation Hearing.	3.50	672.50	2,353.75
<b>B220-Employee Benefits/Pensions</b>					
<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
06/28/2024	Lori Seavey	Research re 503(c) motions and emails with R. Sainvil re same (.2).	0.20	465.00	93.00
<b>B230-Financing/Cash Collateral</b>					
<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
06/13/2024	John Dodd	Call with K. Whittam regarding extension of use of cash collateral.	0.20	1,345.00	269.00
06/14/2024	Paul Keenan	Correspondence and analysis regarding financial reporting and cash collateral issues.	0.40	1,645.00	658.00
06/17/2024	John Dodd	Review materials relating to Cash Collateral Budget and next steps regarding same (.4); multiple calls regarding same K. Whittam (.2).	0.60	1,345.00	807.00
06/17/2024	Kevin Whittam	Emails with H. Light on final cash collateral order.	0.20	1,345.00	269.00
06/17/2024	Kevin Whittam	Review of final cash collateral order.	0.20	1,345.00	269.00
06/18/2024	John Dodd	Review	0.30	1,345.00	403.50



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		correspondence and Final Cash Collateral Order relating to further Cash Collateral Budget requests.			
06/18/2024	Kevin Whittam	Attend conference call with Cadwalader and J. Dodd on 13-week budget.	0.20	1,345.00	269.00
06/18/2024	Kevin Whittam	Coordinate 13 week budget items.	0.20	1,345.00	269.00
06/18/2024	Paul Keenan	Numerous correspondence and analysis regarding cash collateral budget.	0.30	1,645.00	493.50
06/19/2024	John Dodd	Prepare for and participate in call with I. Bagby and A. Greenberg regarding First Interim Fee Application, Chapter 11 Plan, and confirmation issues (.5); review prior seven cash collateral budgets (.5); call with M. Schofield regarding same (.3); analyze needs for final cash collateral budget to take Debtors through Plan Effective Date (.8).	2.10	1,345.00	2,824.50
06/19/2024	Kevin Whittam	Review of CrowdOut subordination agreement.	0.30	1,345.00	403.50
06/19/2024	Kevin Whittam	Emails with J. Dodd on CrowdOut subordination agreement.	0.10	1,345.00	134.50
06/20/2024	John Dodd	Review materials relating to Cash Collateral Budget and planning next steps regarding same.	1.00	1,345.00	1,345.00



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06/20/2024	Kevin Whittam	Discussions with R. Sainvil about cash collateral order matters.	0.20	1,345.00	269.00
06/20/2024	Kevin Whittam	Review and analysis of final cash collateral order.	0.40	1,345.00	538.00
06/20/2024	Kevin Whittam	Discussions with J. Dodd about cash collateral order matters.	0.20	1,345.00	269.00
06/20/2024	Paul Keenan	Conference with CRO regarding cash collateral budget.	0.20	1,645.00	329.00
06/20/2024	Paul Keenan	Numerous correspondence regarding new budget for cash collateral.	0.40	1,645.00	658.00
06/26/2024	John Dodd	Call with H. Light regarding Cash Collateral Budget and extension request (.5); multiple calls with CWT regarding Cash Collateral Budget (1).	1.50	1,345.00	2,017.50
06/26/2024	Kevin Whittam	Discussions with J. Dodd about cash collateral order matters.	0.20	1,345.00	269.00
06/27/2024	John Dodd	Call with I. Bagby and A. Greenberg regarding Cash Collateral Budget and Liquidation Trustee (.5); call with H. Light regarding same (.2); calls with A. Greenberg regarding Lender Call and Cash Collateral Budget (.6); follow up call with H. Light regarding same (.2); review materials relating to Cash Collateral Budget (1);	3.50	1,345.00	4,707.50



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06/28/2024	John Dodd	comment on draft analyses and revisions to Budget (.5); multiple follow up calls with I. Bagby and A. Greenberg regarding same (.5). Review Cash Collateral Budget and consider next steps.	0.30	1,345.00	403.50

**B260-Board of Directors Matters**

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
06/19/2024	Hein Blaauwendraad	Draft board resolution re. the appointment of a proxy re. settlement agreements.	1.20	338.96	406.75
06/19/2024	Thijs Bogaers	Working session and correspondence with H. Blaauwendraad (BM Amsterdam) regarding the preparation of the board resolution of Mercon B.V. in which a proxy is granted to execute the Settlement Agreement with the current sole managing director of said company.	0.50	613.36	306.68
06/20/2024	Thijs Bogaers	Review, edit and circulate the draft board resolution of Mercon B.V. granting a power of attorney required to enter into the Settlement Agreement with the sole managing director of the company.	0.50	613.36	306.68
06/24/2024	Thijs Bogaers	Circulate the draft board resolution to Resor Team to their review and sign-off,	0.40	613.36	245.34



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		includes follow-up correspondences with Baker Team regarding the execution of said resolution.			
<b>B310-Claims Administration and Objections</b>					
<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
06/21/2024	Paul Keenan	Conference with CRO and senior management team regarding status of claims process.	0.40	1,645.00	658.00
<b>B320-Plan and Disclosure Statement</b>					
<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
06/03/2024	Mark Bloom	Followup on decisions regarding Dutch WHOA Plan and best interests test, Brazil enforcement and bank remedies.	0.20	1,645.00	329.00
06/03/2024	Paul Keenan	Numerous correspondence regarding WHOA statutory requirements and plan.	0.40	1,645.00	658.00
06/03/2024	Paul Keenan	Conference with CRO and Resor regarding feasibility of WHOA plan.	0.60	1,645.00	987.00
06/03/2024	Paul Keenan	Conference with FMO regarding treatment under plan and motion filed by insurers.	0.40	1,645.00	658.00
06/03/2024	Paul Keenan	Conference with R Sainvil regarding preparation for confirmation and hearing.	0.80	1,645.00	1,316.00
06/03/2024	Reginald Sainvil	Telephone conference with FMO regarding implementation of Plan, Trust, and stay relief issues.	0.50	1,195.00	597.50





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06/03/2024	Reginald Sainvil	Conduct legal research regarding burden of the Debtors in connection with plan releases.	1.60	1,195.00	1,912.00
06/03/2024	Reginald Sainvil	Strategy conference with P. Keenan regarding open issues.	0.70	1,195.00	836.50
06/04/2024	Lori Seavey	Emails with R. Sainvil regarding draft notice of effective date (.1); draft notice (1.6).	1.70	465.00	790.50
06/04/2024	Maribel Fontanez	Assist in drafting of confirmation brief.	2.70	465.00	1,255.50
06/04/2024	Maribel Fontanez	Prepare plan supplement (.8); communicate with R. Sainvil regarding same (.1).	0.90	465.00	418.50
06/04/2024	Paul Keenan	Conference with shareholder regarding status of plan process.	0.40	1,645.00	658.00
06/04/2024	Reginald Sainvil	Draft and revise retained causes of action schedule.	3.80	1,195.00	4,541.00
06/04/2024	Reginald Sainvil	Correspondence with P. Keenan and Riveron team regarding plan solicitation.	0.40	1,195.00	478.00
06/04/2024	Reginald Sainvil	Telephone conference with D. Shear regarding confirmation brief.	0.50	1,195.00	597.50
06/04/2024	Reginald Sainvil	Preparation of plan supplement materials.	0.80	1,195.00	956.00
06/05/2024	Dionna Shear	Conduct initial review and analysis of UST objection to Plan to prepare rebuttal points.	2.50	1,060.00	2,650.00
06/05/2024	Maribel Fontanez	Research debtor releases (.8); communicate with D. Shear regarding same (.2).	1.00	465.00	465.00



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06/05/2024	Mark Bloom	Exchange of multiple emails with RESOR & HLight regarding effort to value Nicaragua claims relating to expropriation of assets and suitability for Dutch best interests test, and related issues in coordination of Chapter 11 and WHOA Plans.	0.40	1,645.00	658.00
06/05/2024	Paul Keenan	Correspondence and analysis with CRO regarding liquidation analysis.	0.40	1,645.00	658.00
06/05/2024	Reginald Sainvil	Preparation of memorandum of law in support of confirmation.	3.60	1,195.00	4,302.00
06/06/2024	Dionna Shear	Research Judge Wiles' prior memorandums and orders on debtor releases contain in chapter 11 plans.	3.90	1,060.00	4,134.00
06/06/2024	Mark Bloom	Preparation for (.2) & participation in weekly telephone conference with Observer, RESOR and Riveron regarding WHOA Plan, surplus value and best interests test (1.0).	1.20	1,645.00	1,974.00
06/06/2024	Reginald Sainvil	Draft and revise memorandum of law in support of confirmation.	2.70	1,195.00	3,226.50
06/06/2024	Reginald Sainvil	Further revision of declarations in support of plan confirmation.	1.80	1,195.00	2,151.00
06/06/2024	Reginald Sainvil	Analyze case law regarding confirmation	4.00	1,195.00	4,780.00



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		requirements related to releases, cramdown, and justification of treatment for separate classifications.			
06/06/2024	Reginald Sainvil	Analyze draft WHOA Plan and Observer comments.	0.80	1,195.00	956.00
06/07/2024	Dionna Shear	Prepare list of supplemental evidence we need to gather from the client to support the proposed debtor releases in the chapter 11 plan.	1.10	1,060.00	1,166.00
06/07/2024	Mark Bloom	Summary review of & exchange of emails with RESOR team regarding Observer draft opinion on proposed WHOA Plan.	0.40	1,645.00	658.00
06/09/2024	Paul Keenan	Conference with J Dodd to prepare for confirmation of liquidating plan and hearing on same.	0.90	1,645.00	1,480.50
06/09/2024	Reginald Sainvil	Telephone conference with J. Dodd regarding confirmation issues.	0.50	1,195.00	597.50
06/10/2024	John Dodd	Call with P. Keenan and B. Cahn regarding Confirmation Hearing.	0.40	1,345.00	538.00
06/10/2024	Maribel Fontanez	Assist in drafting Confirmation declaration.	1.30	465.00	604.50
06/10/2024	Mark Bloom	Conference with SPeeple's regarding Plan and Nicaragua claims valuation, judicial approach and WHOA plan advocacy.	0.20	1,645.00	329.00
06/10/2024	Paul Keenan	Numerous correspondence and	0.80	1,645.00	1,316.00



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		analysis regarding plan confirmation issues.			
06/10/2024	Paul Keenan	Conference with H Light regarding WHOA proceeding and plan confirmation.	0.40	1,645.00	658.00
06/10/2024	Paul Keenan	Conference with R Sainvil regarding preparation for plan confirmation hearing.	0.40	1,645.00	658.00
06/10/2024	Paul Keenan	Conference with J Dodd to prepare for plan confirmation and hearing, and address expected issues.	0.90	1,645.00	1,480.50
06/10/2024	Reginald Sainvil	Analyze case law regarding debtor releases.	2.80	1,195.00	3,346.00
06/10/2024	Reginald Sainvil	Draft and revise memorandum of law in support of confirmation.	3.60	1,195.00	4,302.00
06/10/2024	Reginald Sainvil	Analyze and resolve issues regarding solicitation packages and publication.	1.00	1,195.00	1,195.00
06/11/2024	Dionna Shear	Research grounds for rebutting UST objection regarding treatment of Class 8 Equity Interests and Class 4B under the Fourth Amended Plan.	1.70	1,060.00	1,802.00
06/11/2024	Dionna Shear	Draft response to UST objection regarding treatment of Class 8 Equity Interests and Class 4B under the Fourth Amended Plan.	1.20	1,060.00	1,272.00
06/11/2024	Dionna Shear	Conduct follow up research for favorable cases regarding confirmation of debtor	2.30	1,060.00	2,438.00



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06/11/2024	Dionna Shear	releases in Chapter 11 plan. Draft response to UST objection to Debtor Releases for inclusion in Brief in support of Fourth Amended Plan.	4.10	1,060.00	4,346.00
06/11/2024	John Dodd	Initial review of draft confirmation brief (.5); call with R. Sainvil regarding same (.1); detailed review of and comment on draft confirmation brief (2).	2.60	1,345.00	3,497.00
06/11/2024	Lori Seavey	Telephone call with R. Sainvil regarding confirmation brief filing (.2); compile precedent re same (.6); receive draft brief and review and prepare table of authorities in preparation for filing (1.5); emails with R. Sainvil re same (.1).	2.40	465.00	1,116.00
06/11/2024	Paul Keenan	Correspondence and analysis in preparation for plan confirmation.	0.40	1,645.00	658.00
06/11/2024	Paul Keenan	Drafting and revising confirmation brief.	0.80	1,645.00	1,316.00
06/11/2024	Paul Keenan	Conference with CWT regarding WHOA plan issues.	0.20	1,645.00	329.00
06/11/2024	Reginald Sainvil	Draft and revise memorandum of law in support of confirmation.	4.60	1,195.00	5,497.00
06/11/2024	Reginald Sainvil	Analyze and revise retained causes of action schedule.	0.80	1,195.00	956.00
06/11/2024	Reginald Sainvil	Draft and revise analysis regarding debtor releases and evidentiary support.	3.80	1,195.00	4,541.00
06/12/2024	John Dodd	Review and comment	3.10	1,345.00	4,169.50



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06/12/2024	Lori Seavey	draft Confirmation Declaration (2); review and comment on Confirmation Brief (.5); call with R. Sainvil regarding confirmation brief and supporting declaration (.2); call with B. Cahn regarding same (.2); calls with P. Keenan regarding same (.2). Telephone call with M. Fontanez regarding coordination of confirmation brief filing (.2); receive final brief and generate and revise Table of Authorities for same (.3).	0.50	465.00	232.50
06/12/2024	Lori Seavey	Receive declaration in support of confirmation and attend to filing and emails with R. Sainvil and Kroll regarding service (.2).	0.20	465.00	93.00
06/12/2024	Maribel Fontanez	Finalize confirmation brief (.3); communicate with L. Seavey and R. Sainvil regarding same (.2).	0.50	465.00	232.50
06/12/2024	Mark Bloom	Drafting of email to HLight, PKeenan regarding Nicaragua claims valuation issue and approach., 12 June telephone conference with Observer.	0.20	1,645.00	329.00
06/12/2024	Paul Keenan	Further conference with J Dodd regarding plan confirmation and other issues.	0.30	1,645.00	493.50
06/12/2024	Paul Keenan	Analysis of CRO	1.10	1,645.00	1,809.50



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06/12/2024	Paul Keenan	declaration in support of confirmation and correspondence regarding same. Conferences with J Dodd regarding plan confirmation and other issues.	0.20	1,645.00	329.00
06/12/2024	Paul Keenan	Conference with R Sainvil regarding preparation for plan confirmation.	0.30	1,645.00	493.50
06/12/2024	Paul Keenan	Drafting and revising plan confirmation brief.	1.20	1,645.00	1,974.00
06/12/2024	Paul Keenan	Further drafting and revising plan confirmation brief.	1.30	1,645.00	2,138.50
06/12/2024	Reginald Sainvil	Analyze case law regarding releases and exculpations and develop outline for factual support required to support such provisions.	1.70	1,195.00	2,031.50
06/12/2024	Reginald Sainvil	Continue to draft and revise memorandum of law in support of confirmation.	3.80	1,195.00	4,541.00
06/12/2024	Reginald Sainvil	Strategy conference with P. Keenan and H. Light regarding plan issues.	0.20	1,195.00	239.00
06/12/2024	Reginald Sainvil	Strategy conference with H. Light regarding confirmation brief.	0.20	1,195.00	239.00
06/12/2024	Reginald Sainvil	Continue to draft and revise declaration in support of confirmation brief.	2.40	1,195.00	2,868.00
06/12/2024	Reginald Sainvil	Analyze and revise retained causes of action list.	0.70	1,195.00	836.50
06/13/2024	John Dodd	Call with H. Light, P.	0.80	1,345.00	1,076.00



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August 30, 2024

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		Keenan, and K. Whittam regarding cash collateral budget and plan confirmation issues (.5); review prior approved cash collateral budgets in connection with same (.2); call with R. Sainvil regarding Plan Supplement (.1).			
06/13/2024	Maribel Fontanez	Finalize, e-file and process for service plan supplement (.4); communicate with R. Sainvil regarding same (.1).	0.50	465.00	232.50
06/13/2024	Paul Keenan	Numerous correspondence with R Sainvil and others regarding plan supplement and other plan confirmation issues.	0.60	1,645.00	987.00
06/13/2024	Reginald Sainvil	Analyze Brazilian Ancillary proceeding issues and consider potential related confirmation issues.	0.70	1,195.00	836.50
06/13/2024	Reginald Sainvil	Analyze issues related to plan confirmation (2.0); begin drafting analysis regarding potential plan objections (2.3).	4.30	1,195.00	5,138.50
06/13/2024	Reginald Sainvil	Analyze and revise assumption schedule.	1.20	1,195.00	1,434.00
06/13/2024	Reginald Sainvil	Analyze liquidating trust agreement.	1.10	1,195.00	1,314.50
06/13/2024	Reginald Sainvil	Draft and revise plan supplement.	1.40	1,195.00	1,673.00
06/14/2024	Mariana Conrado	Exchange emails with Harve Light to confirm if additional collaboration	0.20	545.00	109.00





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		measures involving the plan will be necessary to be taken in Brazil, due to the fact that, as mentioned before, the plan would provide for the sale of assets of the Brazilian company and the closing of the company.			
06/14/2024	Mark Bloom	Exchange of multiple emails with HLight, Brazil team regarding Plan implementation, appeal of clarifying order and protection of Brazil assets.	0.40	1,645.00	658.00
06/14/2024	Paul Keenan	Review of draft liquidating trust agreement.	0.50	1,645.00	822.50
06/14/2024	Paul Keenan	Conference with shareholder regarding status of confirmation process.	0.90	1,645.00	1,480.50
06/14/2024	Reginald Sainvil	Analyze WHOA plan and consider potential confirmation issues related to SME claims.	0.80	1,195.00	956.00
06/14/2024	Reginald Sainvil	Analyze summary of research regarding plan releases.	0.80	1,195.00	956.00
06/14/2024	Reginald Sainvil	Draft outline regarding supplemental brief in support of confirmation and identify critical issues.	3.80	1,195.00	4,541.00
06/14/2024	Reginald Sainvil	Analyze and revise plan supplement documents and numerous related correspondence.	2.70	1,195.00	3,226.50
06/14/2024	Reginald Sainvil	Continue to analyze terms of draft	0.90	1,195.00	1,075.50



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06/16/2024	Paul Keenan	Liquidating Trust Agreement. Analysis of plan confirmation issues raised by UST and court at disclosure hearing in preparation for plan confirmation hearing.	1.20	1,645.00	1,974.00
06/17/2024	Maribel Fontanez	Review, finalize and e-file second plan supplement (.4); communicate with R. Sainvil regarding same (.1).	0.50	465.00	232.50
06/17/2024	Maribel Fontanez	Review, finalize, efile and process for service confirmation brief.	2.30	465.00	1,069.50
06/17/2024	Mark Bloom	Followup exchange of emails on status of efforts and workstreams in Netherlands and Brazil.	0.20	1,645.00	329.00
06/17/2024	Reginald Sainvil	Analyze terms of draft Liquidating Trust Agreement and compare certain plan terms.	1.40	1,195.00	1,673.00
06/18/2024	John Dodd	Plan and prepare for Confirmation Hearing on Chapter 11 Plan.	0.40	1,345.00	538.00
06/18/2024	Lori Seavey	Draft shell for supplemental confirmation brief and emails with R. Sainvil re same.	0.40	465.00	186.00
06/18/2024	Maribel Fontanez	Prepare draft confirmation order template and notice of filing same.	2.20	465.00	1,023.00
06/18/2024	Maribel Fontanez	Prepare notice of filing third plan supplement.	0.40	465.00	186.00
06/18/2024	Paul Keenan	Conference with J	0.60	1,645.00	987.00



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		Dodd and B Cahn regarding expected objections to confirmation and preparation for confirmation hearing.			
06/18/2024	Reginald Sainvil	Analyze insurance policy review.	0.70	1,195.00	836.50
06/18/2024	Reginald Sainvil	Analyze preliminary voting results.	0.40	1,195.00	478.00
06/18/2024	Reginald Sainvil	Develop outline for supplemental memorandum of law in support of plan confirmation.	3.70	1,195.00	4,421.50
06/18/2024	Reginald Sainvil	Analyze contract review and consider assumption schedule revisions.	0.90	1,195.00	1,075.50
06/19/2024	John Dodd	Review Chapter 11 Plan and CrowdOut credit documents (.3); calls with J. Copeland regarding CrowdOut claim and treatment under Chapter 11 Plan (.3); multiple correspondence with J. Copeland, K. Whittman, and R. Sainvil regarding same (.2); correspond with I. Bagby and A. Greenberg regarding CrowdOut proposed revisions to form of Confirmation Order (.2).	1.00	1,345.00	1,345.00
06/19/2024	Paul Keenan	Close analysis of UST objection and outlining responses to same.	0.30	1,645.00	493.50
06/19/2024	Paul Keenan	Close analysis of AHG objection and 3018 motion and	0.20	1,645.00	329.00



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06/19/2024	Paul Keenan	outlining responses to same. Brief analysis of revised amendment and correspondence regarding same.	0.30	1,645.00	493.50
06/20/2024	Annasofia Roig	Conferences with R. Sainvil regarding required research to respond to the objection of the US Trustee.	4.20	895.00	3,759.00
06/20/2024	John Dodd	Call with R. Sainvil regarding draft Confirmation Order, revisions to Chapter 11 and Plan Supplement, anticipated UST confirmation objection, planning for Confirmation Hearing (.6); review of Chapter 11 Plan and draft Confirmation Order (.7); planning for Confirmation Hearing and UST Objection (.5); review issues relating to Liquidation Trust Agreement (.3); review and comment relating to pay down of prepetition bank debt and allocation of same (.4); review London Forfeiting request to treat late ballot as timely submitted (.1).	2.60	1,345.00	3,497.00
06/20/2024	Lori Seavey	Emails with R. Sainvil regarding confirmation hearing prep (.1); research re	0.70	465.00	325.50



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06/20/2024	Maribel Fontanez	precedent hearing transcripts (.6). Research confirmation orders.	0.60	465.00	279.00
06/20/2024	Maribel Fontanez	Review docket for objections to confirmation of plan; circulate same to team.	0.20	465.00	93.00
06/20/2024	Mark Bloom	Initial review of Objections to Confirmation (.3), and planning for Reply in respect of Dutch law and WHOA Plan issues (.4).	0.70	1,645.00	1,151.50
06/20/2024	Paul Keenan	Correspondence and analysis regarding vote tabulation.	0.20	1,645.00	329.00
06/20/2024	Paul Keenan	Correspondence and analysis regarding plan confirmation objection and motion by certain insurance companies.	0.40	1,645.00	658.00
06/20/2024	Paul Keenan	Conference with R Sainvil and J Dodd regarding preparation for confirmation hearing.	0.20	1,645.00	329.00
06/20/2024	Paul Keenan	Analysis of preliminary plan revisions.	0.40	1,645.00	658.00
06/20/2024	Paul Keenan	Initial analysis of US Trustee objection to plan confirmation.	0.60	1,645.00	987.00
06/20/2024	Reginald Sainvil	Draft and revise proposed findings of fact and conclusions of law and confirmation order.	3.10	1,195.00	3,704.50
06/20/2024	Reginald Sainvil	Analyze and address voting issues raised by creditors.	0.80	1,195.00	956.00
06/20/2024	Reginald Sainvil	Analyze confirmation objection filed by the	2.60	1,195.00	3,107.00



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06/20/2024	Reginald Sainvil	US Trustee and outline response. Strategy conference with M. Bloom regarding plan classification issues.	0.20	1,195.00	239.00
06/20/2024	Reginald Sainvil	Analyze and revise proposed confirmation order provisions to address insurer and subordination issues.	0.80	1,195.00	956.00
06/20/2024	Reginald Sainvil	Analyze proposed plan modifications from Rabobank.	0.70	1,195.00	836.50
06/20/2024	Reginald Sainvil	Analyze cash collateral and assess issues related to approved budget and secured lender pay downs.	0.50	1,195.00	597.50
06/20/2024	Reginald Sainvil	Analyze case law regarding unfair treatment.	0.50	1,195.00	597.50
06/21/2024	Annasofia Roig	Continue reviewing and analyzing case law in order to respond to the objection of the US Trustee.	2.90	895.00	2,595.50
06/21/2024	Jacob Kaplan	Call with B&M team to discuss plan confirmation and debtor releases.	0.50	1,295.00	647.50
06/21/2024	John Dodd	Call with R. Sainvil regarding UST objection to confirmation (.6); call with I. Bagby and A. Greenberg regarding Cash Collateral Budget and Chapter 11 Plan (.7); call with H. Light regarding same (.7); review materials relating to	2.50	1,345.00	3,362.50



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06/21/2024	Lori Seavey	Chapter 11 Plan and Confirmation Hearing (.5). Emails with R. Sainvil and chambers regarding confirmation hearing (.1).	0.10	465.00	46.50
06/21/2024	Mark Bloom	Review of UST Objection to Confirmation -- Dutch WHOA and disparate treatment issues (.3) -- and drafting of internal email with analysis of issues and options for Reply and confirmation hearing (1.2).	1.50	1,645.00	2,467.50
06/21/2024	Michael Matthiesen	Telephone correspondence with R. Sainvil regarding standard for redacting names in SDNY Bankruptcy court (.4); research and analyze case law regarding same (.6).	1.00	670.00	670.00
06/21/2024	Paul Keenan	Conference with J Dodd regarding plan confirmation issues.	0.30	1,645.00	493.50
06/21/2024	Paul Keenan	Conference with CRO and correspondence regarding plan confirmation.	0.20	1,645.00	329.00
06/21/2024	Reginald Sainvil	Analyze and revise draft declaration in support of releases.	1.80	1,195.00	2,151.00
06/21/2024	Reginald Sainvil	Telephone conference with J. Dodd and H. Light regarding plan confirmation and cash collateral issues.	0.60	1,195.00	717.00
06/21/2024	Reginald Sainvil	Draft and revise reply	3.40	1,195.00	4,063.00



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06/21/2024	Reginald Sainvil	to US Trustee plan objection. Analyze case law regarding unfair discrimination issues arising in connection with 1129 requirements.	2.60	1,195.00	3,107.00
06/21/2024	Reginald Sainvil	Analyze voting detail report.	0.80	1,195.00	956.00
06/21/2024	Reginald Sainvil	Telephone conference with J. Dodd regarding plan confirmation issues.	0.50	1,195.00	597.50
06/21/2024	Reginald Sainvil	Telephone conference with Kroll team regarding voting results.	0.30	1,195.00	358.50
06/21/2024	Reginald Sainvil	Analyze subordination issues and potential insert for confirmation order.	1.00	1,195.00	1,195.00
06/22/2024	John Dodd	Call with I. Bagby and A. Greenberg regarding plan and cash collateral issues (.4); call with R. Sainvil regarding Confirmation Hearing, and Reply Brief (.7); review general case law in connection with Reply Brief (1.1); review case law in connection with Estate Releases in connection with Reply Brief and Confirmation Hearing (3.1).	5.30	1,345.00	7,128.50
06/22/2024	Maribel Fontanez	Assist in preparation of supplemental confirmation brief.	0.60	465.00	279.00
06/22/2024	Maribel Fontanez	Retrieve various opinions regarding releases and	3.10	465.00	1,441.50





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06/22/2024	Reginald Sainvil	confirmation order from precedent case (.8); review transcripts from combined hearing in precedent case regarding releases (1.8); review Mercon DS hearing transcripts regarding releases (.5). Draft and revise declaration in support of supplemental confirmation brief and reply to UST objection.	2.80	1,195.00	3,346.00
06/22/2024	Reginald Sainvil	Strategy conference with J. Dodd regarding plan confirmation issues.	0.70	1,195.00	836.50
06/22/2024	Reginald Sainvil	Draft and revise memorandum of law in support of supplemental memorandum of law and reply to plan confirmation objection.	4.40	1,195.00	5,258.00
06/23/2024	John Dodd	Review and analyze potential greenlist of potential releasees (.3); review list of redaction names (.2); consider settlement options and implementation strategy related to releases and redaction issues (.5); call with P. Keenan regarding confirmation objection (.4); call with H. Light regarding confirmation objection (.3); analyze legal arguments relating to	3.40	1,345.00	4,573.00



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		confirmation objection (.9); review factual materials relating to same (.8).			
06/23/2024	Maribel Fontanez	Assist in preparation of supplemental confirmation brief.	0.20	465.00	93.00
06/23/2024	Michael Matthiesen	Continue research and analyze of case law regarding standard for redacting names in SDNY Bankruptcy court (.4); Finalize analysis (.4); email correspondence with R. Sainvil regarding same (.3).	1.10	670.00	737.00
06/23/2024	Paul Keenan	Conference with J Dodd regarding arguments on limitation on liability.	0.40	1,645.00	658.00
06/23/2024	Paul Keenan	Analysis of arguments on releases and consideration for same.	0.70	1,645.00	1,151.50
06/23/2024	Reginald Sainvil	Strategy conference with J. Dodd regarding plan confirmation issues.	1.00	1,195.00	1,195.00
06/23/2024	Reginald Sainvil	Analyze and revise supplemental declaration in support of plan confirmation.	2.70	1,195.00	3,226.50
06/24/2024	Jacob Kaplan	Review summary of cases dealing with debtor releases.	0.20	1,295.00	259.00
06/24/2024	James Gilmore	Draft opening statement and script for chapter 11 confirmation hearing.	1.80	825.00	1,485.00
06/24/2024	James Gilmore	Assess legal standards and requirements in connection with confirmation brief and fourth amendment	3.40	825.00	2,805.00



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06/24/2024	John Dodd	declaration in preparation for draft opening statement and script for chapter 11 confirmation hearing. Review and analyze UST Confirmation Objection (.7); review and revise reply in support of confirmation of Chapter 11 Plan (1.4); plan strategy for resolving UST confirmation objection (.4); call with UST and R. Sainvil regarding potential resolution of Objection to Confirmation and redaction issues (.5); call with A. Greenberg regarding confirmation hearing and UST Objection to Confirmation (.3); call with H. Light and R. Sainvil regarding same (.4).	3.70	1,345.00	4,976.50
06/24/2024	Maribel Fontanez	Assist in finalizing voting declaration.	0.20	465.00	93.00
06/24/2024	Mark Bloom	Further analysis of UST 1129 issues in Objection (.4), and series of email exchanges with HLight and team regarding resolution of same (.8); exchange of emails with RESOR team and telephone conference with RSainvil regarding WHOA Plan decision	1.90	1,645.00	3,125.50



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06/24/2024	Michael Matthiesen	(.5), JDodd re other aspects of UST Objection (.2). Telephone correspondence with R. Sainvil regarding standard for redacting names in SDNY Bankruptcy court (.4); research and analyze case law regarding same (1.0).	1.40	670.00	938.00
06/24/2024	Paul Keenan	Conference with shareholder regarding status of plan confirmation.	0.50	1,645.00	822.50
06/24/2024	Paul Keenan	Numerous correspondence and analysis regarding response to UST objection.	0.60	1,645.00	987.00
06/24/2024	Reginald Sainvil	Analyze and revise supplemental declaration in support of confirmation and debtor releases.	2.40	1,195.00	2,868.00
06/24/2024	Reginald Sainvil	Analyze and revise released party terms set forth in the Plan.	1.70	1,195.00	2,031.50
06/24/2024	Reginald Sainvil	Telephone conference with US Trustee's office and J. Dodd.	0.50	1,195.00	597.50
06/24/2024	Reginald Sainvil	Analyze voting certification, voting detail report, and tabulation.	0.60	1,195.00	717.00
06/25/2024	Jacob Kaplan	Meet with J. Dodd and R. Sainvil regarding hearing strategy and preparation of H. Light.	1.50	1,295.00	1,942.50
06/25/2024	John Dodd	Review and analyze draft First Supplemental H. Light Declaration (.8);	5.80	1,345.00	7,801.00



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06/25/2024	Lori Seavey	revise First Supplemental H. Light Declaration (1.4); review and revise Reply in support of Confirmation of Fourth Amended Chapter 11 Plan (3.1); call with J. Kaplan regarding witness preparation for H. Light (.5). Receive drafts of reply brief and declaration in support of confirmation and review citations, tables of contents and authorities for accuracy (2.4); receive J. Dodd edits/ comments to brief and incorporate (.8); prepare final versions for filing and attend to filing brief and declaration (.5); circulate to Baker team and email to Kroll for service (.1).	3.80	465.00	1,767.00
06/25/2024	Paul Keenan	Correspondence and analysis regarding various plan confirmation issues.	0.80	1,645.00	1,316.00
06/25/2024	Paul Keenan	Numerous correspondence and analysis regarding arguments in favor of limited debtor release.	0.90	1,645.00	1,480.50
06/25/2024	Reginald Sainvil	Analyze and revise reply in support of confirmation and in response to UST objection.	2.70	1,195.00	3,226.50



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06/25/2024	Reginald Sainvil	Prepare for confirmation hearing.	1.80	1,195.00	2,151.00
06/25/2024	Reginald Sainvil	Analyze and revise supplemental declaration in support of confirmation.	1.40	1,195.00	1,673.00
06/25/2024	Reginald Sainvil	Analyze hearing transcripts and precedent confirmation orders and outline key points to address issues related to plan confirmation.	2.00	1,195.00	2,390.00
06/26/2024	Jacob Kaplan	Review Voyager transcripts on release criteria (2.0); call with H. Light to prepare for hearing (1.0); additional preparation call with H. Light (1.0); draft supplemental declaration to address rationale for releases of each group of Mercon D&Os (2.0); review H. Light proposed revisions to supplemental declaration (.8).	6.80	1,295.00	8,806.00
06/26/2024	John Dodd	Multiple witness preparation sessions with H. Light and Baker team (1.9); call with CrowdOut regarding Subordinated Claims Class treatment (.1); review and comment regarding proposed form of Confirmation Order in connection with Mercon Confirmation Hearing	4.50	1,345.00	6,052.50



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06/26/2024	Lori Seavey	(1.3); initial preparations for Mercon Confirmation Hearing (1.2). Revisions to confirmation hearing agenda (.4); telephone call with R. Sainvil regarding confirmation hearing Agenda draft (.1) and revise accordingly (.2); prepare same for filing and attend to filing (.1); email Kroll re: service (.1); telephone call with R. Sainvil re: final preparations for confirmation hearing (.3).	1.20	465.00	558.00
06/26/2024	Maribel Fontanez	Retrieve confirmation related court filings and prepare digital confirmation hearing binders (2.0); retrieve case law and prepare binder (2.3).	4.30	465.00	1,999.50
06/26/2024	Paul Keenan	Conference with CRO and senior management team regarding next steps in plan confirmation process.	0.50	1,645.00	822.50
06/26/2024	Reginald Sainvil	Analyze and revise draft confirmation order, findings of fact, and conclusions of law.	1.80	1,195.00	2,151.00
06/26/2024	Reginald Sainvil	Preparation for confirmation hearing with J. Kaplan and H. Light.	2.00	1,195.00	2,390.00
06/26/2024	Reginald Sainvil	Draft and revise	2.40	1,195.00	2,868.00



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06/26/2024	Reginald Sainvil	outline for confirmation hearing. Strategy conference with J. Dodd, H. Light, and J. Kaplan regarding debtor releases and support required.	0.80	1,195.00	956.00
06/26/2024	Reginald Sainvil	Correspondence with J. Copeland regarding subordination issues.	0.20	1,195.00	239.00
06/26/2024	Reginald Sainvil	Analyze and revise further supplemental declaration in support D&O releases.	0.50	1,195.00	597.50
06/26/2024	Reginald Sainvil	Analyze equity interest issues and develop insert for confirmation order.	0.70	1,195.00	836.50
06/26/2024	Reginald Sainvil	Analyze transcripts and relevant precedent in connection with confirmation hearing preparation.	1.70	1,195.00	2,031.50
06/27/2024	Jacob Kaplan	Draft direct and redirect outline for H. Light (2.0); review J. Dodd comments on draft supplemental H. Light declaration (.6); draft updated chart of categories of Released Mercon D&Os (.8); review and revise updated version of draft supplemental declaration (.5); call with H. Light and J. Dodd to prepare for hearing (.5).	4.40	1,295.00	5,698.00
06/27/2024	John Dodd	Review and comment on Keurig reservation of setoff rights in connection with Confirmation Hearing	5.60	1,345.00	7,532.00





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		(.2); planning for confirmation hearing (.3); call with R. Sainvil regarding same (.3); review and comment concerning Second Supplemental Light Declaration (.7); call with R. Weber re Confirmation Hearing (.2); witness preparation call (H. Light) for Confirmation Hearing with J. Kaplan (1.6); multiple turns of proposed form of Confirmation Order regarding Rabobank comments (1.2); multiple calls with I. Bagby and A. Greenberg regarding same (.4); review materials in connection with Confirmation Hearing (.7).			
06/27/2024	Lori Seavey	Review/revise supplemental declaration of Harve Light in support of disclosure statement (.4); emails with Baker team re same (.1).	0.50	465.00	232.50
06/27/2024	Lori Seavey	Research Wiles case precedent re confirmation (.2); review case docket and pleadings for hearing binder for 6/28 hearings (1.7); emails with J. Dodd and R. Sainvil regarding edits to Light Declaration (.1);	6.40	465.00	2,976.00



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		revise declaration per J. Dodd comments and edits (.4); review J. Kaplan version of further supplement (.3); receive final declaration and review in advance of filing (1.0); email to chambers, Kroll, and Baker team regarding filed pleadings (.1); amend agenda to reflect latest filing (.3); coordinate preparation of additional hearing materials and binder updates for Baker team (.2); prepare notice of filing confirmation order for filing; circulate to J. Dodd (.2); review proposed confirmation order in preparation for filing (.8); receive final notice of filing third plan supplement and exhibits, and prepare for filing (.4); receive final notice of filing confirmation order and form of confirmation order and attend to filing (.4); updates to agenda re same; file amended agenda; circulate to Baker team, Kroll and chambers (.3).			
06/27/2024	Maribel Fontanez	Review docket, retrieve Kroll documents in support of plan, and prepare binder in preparation	0.40	465.00	186.00



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
06/27/2024	Maribel Fontanez	for confirmation hearing. Gather Light declarations (.2); prepare binder in preparation for confirmation hearing (.3).	0.50	465.00	232.50
06/27/2024	Maribel Fontanez	Research on Section 1129 / confirmation hearing transcripts.	1.80	465.00	837.00
06/27/2024	Maribel Fontanez	Prepare redline of confirmation order.	0.10	465.00	46.50
06/27/2024	Reginald Sainvil	Strategy conference with Baker team regarding plan confirmation hearing.	0.40	1,195.00	478.00
06/27/2024	Reginald Sainvil	Prepare for plan confirmation hearing.	1.50	1,195.00	1,792.50
06/27/2024	Reginald Sainvil	Analyze equity interest retention issue and develop resolution to be incorporated into confirmation order.	0.80	1,195.00	956.00
06/27/2024	Reginald Sainvil	Correspondence with J. Copeland regarding confirmation order.	0.20	1,195.00	239.00
06/27/2024	Reginald Sainvil	Analyze and revise confirmation order.	1.70	1,195.00	2,031.50
06/27/2024	Reginald Sainvil	Analyze revised liquidating trust agreement and consider consistency with plan terms.	1.10	1,195.00	1,314.50
06/27/2024	Reginald Sainvil	Develop outline to address plan modifications and objections.	1.80	1,195.00	2,151.00
06/27/2024	Reginald Sainvil	Strategy conference with K. Hoogenboezem regarding BV equity interests.	0.20	1,195.00	239.00
06/28/2024	Blaire Cahn	Preparing materials for confirmation hearing.	1.50	1,345.00	2,017.50



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
06/28/2024	Jacob Kaplan	Prepare for confirmation hearing (1.0); attend confirmation hearing (2.0).	3.00	1,295.00	3,885.00
06/28/2024	John Dodd	Prepare presentation for Mercon Confirmation Hearing (3.2); attend and participate in Confirmation Hearing (1.7).	4.90	1,345.00	6,590.50
06/28/2024	Lori Seavey	Revisions to hearing binder materials and review of additional materials for hearing (.7).	0.70	465.00	325.50
06/28/2024	Maribel Fontanez	Draft shell for supplemental brief in support of debtors releases.	0.80	465.00	372.00
06/28/2024	Paul Keenan	Argument at contested plan confirmation hearing, and post hearing conference with counsel for UCC and secured lenders.	2.80	1,645.00	4,606.00
06/28/2024	Paul Keenan	Preparation for contested plan confirmation hearing.	2.30	1,645.00	3,783.50
06/28/2024	Reginald Sainvil	Prepare for and attend chapter 11 plan confirmation hearing.	4.70	1,195.00	5,616.50
06/28/2024	Reginald Sainvil	Analyze case law and prepare analysis regarding estate releases and scope and consideration of same.	3.60	1,195.00	4,302.00
06/28/2024	Reginald Sainvil	Prepare 1129 analysis in support of plan confirmation.	1.70	1,195.00	2,031.50
06/29/2024	Blaire Cahn	Call re 503(c) materials (.6); reviewing materials re same (.5).	1.10	1,345.00	1,479.50



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
06/29/2024	John Dodd	Call with P. Keenan and B. Cahn regarding Supplemental Brief in support of Estate Releases.	0.50	1,345.00	672.50
06/29/2024	Mark Bloom	Analysis of 503(c) issues as relate to Plan confirmation, per JWiles sua sponte.	0.30	1,645.00	493.50
06/30/2024	Blaire Cahn	Reviewing 503(c) supplemental issues and communications re same.	0.60	1,345.00	807.00
06/30/2024	Dionna Shear	Research cases analyzing the enforceability of debtor releases to assess whether Section 503(c) applies (1.5); prepare rebuttal arguments explaining why Section 503(c) is inapplicable (1.0).	2.50	1,060.00	2,650.00
06/30/2024	Mark Bloom	Further analysis of 503(c) issue (.8); exchange of multiple emails w/JDodd and team with thoughts regarding brief due 1 July (.8).	1.60	1,645.00	2,632.00
06/30/2024	Reginald Sainvil	Draft and revise order regarding redactions and deeming such request moot.	0.30	1,195.00	358.50
06/30/2024	Reginald Sainvil	Draft and revise supplemental memorandum of law regarding debtor releases.	3.60	1,195.00	4,302.00
06/30/2024	Reginald Sainvil	Analyze case law, secondary sources, and legislative history regarding debtor releases and application of section	4.80	1,195.00	5,736.00



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
06/30/2024	Reginald Sainvil	503(c) of the Bankruptcy Code. Develop outline regarding standard used by courts when determining whether to approve debtor releases.	1.60	1,195.00	1,912.00
Total Hours: 544.90			Total:	587,802.38 USD	



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## Time Summary

### B100-Administration

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Federico Cuadra Del Carmen	29.00	1,345.00	39,005.00
<b>Total</b>	<b>B100-Administration</b>		<b>39,005.00</b>

### B110-Case Administration

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Lori Seavey	7.00	465.00	3,255.00
Maribel Fontanez	9.70	465.00	4,510.50
Paul Keenan	5.30	1,645.00	8,718.50
Reginald Sainvil	1.90	1,195.00	2,270.50
<b>Total</b>	<b>B110-Case Administration</b>		<b>18,754.50</b>

### B120-Asset Analysis and Recovery

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Oanh Nguyen	0.80	950.00	760.00
Paul Keenan	0.60	1,645.00	987.00
<b>Total</b>	<b>B120-Asset Analysis and Recovery</b>		<b>1,747.00</b>

### B130-Asset Disposition

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Adam Aft	0.80	1,225.00	980.00
Annika Thorelli	3.90	470.00	1,833.00
Federico Cuadra Del Carmen	21.40	1,345.00	28,783.00
Grace Blackburn	0.60	850.00	510.00
Hoang Anh Nguyen	5.80	480.00	2,784.00
Maribel Fontanez	0.50	465.00	232.50
Paul Keenan	3.80	1,645.00	6,251.00
Phuoc Anh Tram Nguyen	4.80	280.00	1,344.00
Reginald Sainvil	0.30	1,195.00	358.50
Sanny Doan	0.70	300.00	210.00
Steven Canner	0.40	1,645.00	658.00



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Thijs Bogaers	1.40	613.36	858.70
Zachary Bassen	21.10	750.00	15,825.00
Zachary Bethel	3.00	485.00	1,455.00
<b>Total</b>	<b>B130-Asset Disposition</b>		<b>62,082.70</b>

**B140-Relief from Stay/Adequate Protection**

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Lori Seavey	1.30	465.00	604.50
Maribel Fontanez	0.30	465.00	139.50
Paul Keenan	0.90	1,645.00	1,480.50
Reginald Sainvil	9.30	1,195.00	11,113.50
<b>Total</b>	<b>B140-Relief from Stay/Adequate Protection</b>		<b>13,338.00</b>

**B160-Fee/Employment Applications**

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
John Dodd	0.50	1,345.00	672.50
Lori Seavey	2.10	465.00	976.50
Maribel Fontanez	18.10	465.00	8,416.50
Reginald Sainvil	0.30	1,195.00	358.50
<b>Total</b>	<b>B160-Fee/Employment Applications</b>		<b>10,424.00</b>

**B170-Fee/Employment Objections**

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Maribel Fontanez	1.50	465.00	697.50
<b>Total</b>	<b>B170-Fee/Employment Objections</b>		<b>697.50</b>

**B185-Assumption/Rejection of Leases and Contracts**

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Adam Aft	0.30	1,225.00	367.50
Lori Seavey	0.30	465.00	139.50
Thijs Bogaers	0.70	613.36	429.35
<b>Total</b>	<b>B185-Assumption/Rejection of Leases and Contracts</b>		<b>936.35</b>

**B190-Other Contested Matters**

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Gledson Marques de Campos	1.30	850.00	1,105.00
John Dodd	0.50	1,345.00	672.50





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Mariana Conrado	2.60	545.00	1,417.00
Merredith Fong-Akan	0.50	295.92	147.96
Paul Keenan	7.30	1,645.00	12,008.50
Reginald Sainvil	7.40	1,195.00	8,843.00
Thais Barboza	5.00	335.00	1,675.00
Thijs Bogaers	0.20	613.35	122.67
<b>Total</b>		<b>B190-Other Contested Matters</b>	<b>25,991.63</b>

**B195-Non-Working Travel**

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
John Dodd	6.90	672.50	4,640.25
<b>Total</b>		<b>B195-Non-Working Travel</b>	<b>4,640.25</b>

**B220-Employee Benefits/Pensions**

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Lori Seavey	0.20	465.00	93.00
<b>Total</b>		<b>B220-Employee Benefits/Pensions</b>	<b>93.00</b>

**B230-Financing/Cash Collateral**

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
John Dodd	9.50	1,345.00	12,777.50
Kevin Whittam	2.20	1,345.00	2,959.00
Paul Keenan	1.30	1,645.00	2,138.50
<b>Total</b>		<b>B230-Financing/Cash Collateral</b>	<b>17,875.00</b>

**B260-Board of Directors Matters**

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Hein Blaauwendraad	1.20	338.96	406.75
Thijs Bogaers	1.40	613.36	858.70
<b>Total</b>		<b>B260-Board of Directors Matters</b>	<b>1,265.45</b>

**B310-Claims Administration and Objections**

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Paul Keenan	0.40	1,645.00	658.00
<b>Total</b>		<b>B310-Claims Administration and Objections</b>	<b>658.00</b>

**B320-Plan and Disclosure Statement**

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
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Annasofia Roig	7.10	895.00	6,354.50
Blaire Cahn	3.20	1,345.00	4,304.00
Dionna Shear	19.30	1,060.00	20,458.00
Jacob Kaplan	16.40	1,295.00	21,238.00
James Gilmore	5.20	825.00	4,290.00
John Dodd	47.10	1,345.00	63,349.50
Lori Seavey	18.60	465.00	8,649.00
Mariana Conrado	0.20	545.00	109.00
Maribel Fontanez	25.10	465.00	11,671.50
Mark Bloom	9.20	1,645.00	15,134.00
Michael Matthiesen	3.50	670.00	2,345.00
Paul Keenan	28.60	1,645.00	47,047.00
Reginald Sainvil	155.10	1,195.00	185,344.50
<b>Total</b>		<b>B320-Plan and Disclosure Statement</b>	<b>390,294.00</b>
<b>Total Hours</b>	<b>544.90</b>	<b>Total Fees</b>	<b>587,802.38 USD</b>



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RE: Chapter 11 Cases

**Time Details**

**B100-Administration**

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/01/2024	Federico Cuadra Del Carmen	(0.2) Tend to correspondence from Project Mocha, drafting updates and responses as required; (0.7) Status update calls with Management and Shareholders.	0.90	1,345.00	1,210.50
07/02/2024	Federico Cuadra Del Carmen	Tend to correspondence from Project Mocha, drafting updates and responses as required.	0.20	1,345.00	269.00
07/03/2024	Federico Cuadra Del Carmen	Tend to correspondence from Project Mocha, drafting updates and responses as required.	0.20	1,345.00	269.00
07/04/2024	Federico Cuadra Del Carmen	Tend to correspondence from Project Mocha, drafting updates and responses as required.	0.20	1,345.00	269.00
07/05/2024	Federico Cuadra Del Carmen	(0.4) Tend to correspondence from Project Mocha, drafting updates and responses as required; (0.2) Review Professional Fees Escrow Agreement draft provided by Z. Bassen.	0.60	1,345.00	807.00
07/06/2024	Federico Cuadra Del Carmen	(0.2) Tend to correspondence from Project Mocha, drafting updates and responses as required; (0.2) Review	0.40	1,345.00	538.00



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		Professional Fees Escrow Agreement draft provided by Z. Bassen.			
07/07/2024	Federico Cuadra Del Carmen	Tend to correspondence from Project Mocha, drafting updates and responses as required.	0.20	1,345.00	269.00
07/08/2024	Federico Cuadra Del Carmen	Tend to correspondence from Project Mocha, drafting updates and responses as required.	0.40	1,345.00	538.00
07/09/2024	Federico Cuadra Del Carmen	Tend to correspondence from Project Mocha, drafting updates and responses as required.	0.40	1,345.00	538.00
07/10/2024	Federico Cuadra Del Carmen	Tend to correspondence from Project Mocha, drafting updates and responses as required.	0.20	1,345.00	269.00
07/11/2024	Federico Cuadra Del Carmen	Tend to correspondence from Project Mocha, drafting updates and responses as required.	0.30	1,345.00	403.50
07/12/2024	Federico Cuadra Del Carmen	(0.3) Tend to correspondence from Project Mocha, drafting updates and responses as required; (0.3) Review Service Provider Escrow Agreement provided by Z. Bassen.	0.60	1,345.00	807.00
07/15/2024	Federico Cuadra Del Carmen	(0.3) Tend to correspondence from Project Mocha, drafting updates and responses as required; (0.2) Tend to	0.50	1,345.00	672.50



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		Professional Fees Escrow Agreement.			
07/22/2024	Federico Cuadra Del Carmen	0.3 – Update call with shareholders to discuss transaction updates.	0.30	1,345.00	403.50
07/26/2024	Federico Cuadra Del Carmen	0.3 Draft update to shareholders regarding transaction update.	0.30	1,345.00	403.50
07/30/2024	Federico Cuadra Del Carmen	(0.3) Call with shareholders to discuss court proceeding updates.	0.30	1,345.00	403.50

**B110-Case Administration**

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/01/2024	Lori Seavey	Review recent filings and update case calendar and WIP, circulate to Baker team (.4). Receive revisions to order denying as moot Debtors motion to redact per hearing held on June 28 (.2).	0.60	465.00	279.00
07/01/2024	Maribel Fontanez	Review WIP/ Calendar; update calendar accordingly.	0.20	465.00	93.00
07/01/2024	Paul Keenan	Analysis of most recent financial reports.	0.30	1,645.00	493.50
07/02/2024	Lori Seavey	Review case calendar and WIP re 2015.3 report.	0.10	465.00	46.50
07/02/2024	Maribel Fontanez	Finalize and e-file amended MOR for March 2024 - CISA.	0.40	465.00	186.00
07/03/2024	Paul Keenan	Analysis of recent financial reports.	0.30	1,645.00	493.50
07/08/2024	Lori Seavey	Review case filings and update case calendar; circulate to Baker team (.6).	0.60	465.00	279.00
07/08/2024	Paul Keenan	Analysis of current financial information.	0.30	1,645.00	493.50



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/09/2024	Paul Keenan	Numerous correspondence regarding requests on D&O policies from trustee.	0.40	1,645.00	658.00
07/09/2024	Paul Keenan	Numerous correspondence and analysis regarding turnover requests from trustee.	0.50	1,645.00	822.50
07/10/2024	Mariana Conrado	Review the updated court copies of the case to verify possible measures to be taken on it. Exchange emails with MBloom and PKeenan to confirm how to proceed regarding the invoice that is pending to be issued by the sworn translator.	0.30	545.00	163.50
07/11/2024	Paul Keenan	Analysis of supplemental response by trustee.	0.50	1,645.00	822.50
07/12/2024	Lori Seavey	Emails with R. Sainvil and chambers regarding canceled omnibus hearing (.1); draft notice of cancelled hearing (.4); attend to filing notice and forward to Kroll for service (.1).	0.60	465.00	279.00
07/12/2024	Paul Keenan	Numerous correspondence regarding transfer of accounts and other transfers to trust.	0.40	1,645.00	658.00
07/15/2024	John Dodd	Review and comment on revised form of Order resolving redaction issue and follow up with R.	0.20	1,345.00	269.00



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/15/2024	Lori Seavey	Sainvil regarding same. Review case docket and update WIP/Case calendar; circulate to Baker team (.5).	0.50	465.00	232.50
07/17/2024	Paul Keenan	Conference with Riveron and CRO regarding turnover of material to trustee.	0.50	1,645.00	822.50
07/17/2024	Paul Keenan	Numerous correspondence with J Dodd and R Sainvil regarding establishment of trust, vesting of assets, liabilities and litigation claims, and funding of escrow account.	0.80	1,645.00	1,316.00
07/18/2024	John Dodd	Correspondence regarding multiple case inquiries.	0.20	1,345.00	269.00
07/18/2024	Paul Keenan	Numerous correspondence and conferences regarding issues raised by trustee and turnover of matters.	0.80	1,645.00	1,316.00
07/19/2024	Maribel Fontanez	Review documents regarding redaction of names; communicate with R. Sainvil regarding same.	0.30	465.00	139.50
07/22/2024	Lori Seavey	Update case calendar based on review of the court docket and latest filings (.7); emails with R. Sainvil and M. Fontanez regarding UST monthly operating report deadline change (.1).	0.80	465.00	372.00
07/22/2024	Maribel Fontanez	Finalize and e-file June MORs.	1.00	465.00	465.00



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/22/2024	Maribel Fontanez	Review updated WIP/Calendar; update calendar accordingly.	0.40	465.00	186.00
07/23/2024	Paul Keenan	Correspondence from liquidating trustee regarding information and documents needed for turnover and work on such requests.	0.80	1,645.00	1,316.00
07/24/2024	Maribel Fontanez	Review redacted schedules - mark up and bookmark redacted pages (1.0); communicate with R. Sainvil regarding same (.2).	1.20	465.00	558.00
07/24/2024	Maribel Fontanez	Review / compare unredacted schedules and SOFAs to last filed versions (1.6); communicate with R. Sainvil as to how to best file (.2); prepare notice of filing unredacted schedules and SOFAs (.4).	2.20	465.00	1,023.00
07/24/2024	Paul Keenan	Brief analysis of financial reports.	0.30	1,645.00	493.50
07/24/2024	Paul Keenan	Correspondence and analysis regarding D&O policy documents.	0.40	1,645.00	658.00
07/24/2024	Paul Keenan	Correspondence and analysis regarding requests from liquidating trustee.	0.40	1,645.00	658.00
07/25/2024	Mariana Conrado	Review the status of the case to verify possible measures to be taken on it; exchange emails with MBloom and PKennan to confirm how should we proceed regarding the	0.40	545.00	218.00





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		payment of the pending invoice of the sworn translator.			
07/25/2024	Paul Keenan	Correspondence and analysis regarding UST request for information on D&Os.	0.50	1,645.00	822.50
07/26/2024	Paul Keenan	Conference with J Dodd regarding transition to liquidating trustee.	0.40	1,645.00	658.00
07/26/2024	Paul Keenan	Conference with H Light regarding transition to liquidating trustee.	0.30	1,645.00	493.50
07/29/2024	Lori Seavey	Review latest filings and update case calendar(.4); email with Baker team re same (.1).	0.50	465.00	232.50
07/29/2024	Maribel Fontanez	Prepare notice of status conference (.5); arrange for P. Keenan and R. Sainvil to appear at hearing (.2).	0.70	465.00	325.50
07/30/2024	Lori Seavey	Review order on Motion to Consolidate Lists and email to Baker team and Kroll regarding service (.2).	0.20	465.00	93.00
07/31/2024	Maribel Fontanez	Communicate with R. Sainvil regarding steps needed to go effective (.2); prepare notice of waiver of condition precedent to the occurrence of the effective date (.6); communicate with accounting regarding outstanding fees, etc. (.2).	1.00	465.00	465.00

**B130-Asset Disposition**

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/01/2024	Zachary Bassen	Coordinate professional fee escrow.	0.80	750.00	600.00
07/03/2024	Annika Thorelli	Prepared closing binder index for USA, Brazil and Vietnam.	1.10	470.00	517.00
07/03/2024	Zachary Bassen	Further coordinate professional fees escrow.	0.50	750.00	375.00
07/05/2024	Zachary Bassen	Coordinate release of adjustment escrow; coordinate KYC for professional fee escrow.	0.20	750.00	150.00
07/06/2024	Zachary Bassen	Review joint release instruction.	0.30	750.00	225.00
07/07/2024	Federico Cuadra Del Carmen	Review joint release instruction for adjustment escrow, drafting required changes.	0.20	1,345.00	269.00
07/07/2024	Zachary Bassen	Review and revise joint release instruction, review and revise professional fee escrow.	0.40	750.00	300.00
07/08/2024	Annika Thorelli	Completed closing binder index for Vietnam.	1.10	470.00	517.00
07/08/2024	Ronald Ohren	In light of the inquiry from DUAL claims manager contact D. Caton (DUAL) with respect to the prior “notice of circumstances” under Assa Policy No. 07B61188, e-mail messages with P. Keenan (BM Chicago) and with D. Caton (DUAL) re matters relating to the “notice of circumstances,” and relevant developments	0.50	1,270.00	635.00



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07/08/2024	Zachary Bassen	since that notice was sent. Review and revise escrow agreement (1.0); coordinate KYC process for escrow agreement (.9).	1.90	750.00	1,425.00
07/09/2024	Zachary Bassen	Review professional service fee escrow.	0.20	750.00	150.00
07/10/2024	Zachary Bassen	Review and revise professional fee escrow.	0.60	750.00	450.00
07/15/2024	Zachary Bassen	Call with Citibank to finalize escrow agreement (.4); draft and revise escrow agreement (.3).	0.70	750.00	525.00
07/16/2024	Zachary Bassen	Finalize escrow agreement with Citibank.	0.20	750.00	150.00
07/30/2024	Zachary Bassen	Finalize professional fee escrow.	0.40	750.00	300.00
07/31/2024	Zachary Bassen	Coordinate execution of professional service fee escrow.	0.70	750.00	525.00

**B150-Meetings of and Communications with Creditors**

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/23/2024	Paul Keenan	Correspondence and analysis regarding creditor inquiries.	0.30	1,645.00	493.50
07/23/2024	Paul Keenan	Correspondence and analysis regarding revised proposed confirmation order.	0.40	1,645.00	658.00

**B160-Fee/Employment Applications**

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/01/2024	Maribel Fontanez	Continue working on RESOR first and final fee application.	0.80	465.00	372.00
07/02/2024	Maribel Fontanez	Continue to work on RESOR first and final fee application.	0.70	465.00	325.50
07/08/2024	Maribel Fontanez	Review Riveron,	0.40	465.00	186.00



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		Chipman Brown and GSX monthly fee statements; communicate with R. Sainvil regarding same.			
07/09/2024	Maribel Fontanez	Continue working on Resor fee application.	1.00	465.00	465.00
07/09/2024	Maribel Fontanez	Prepare GSX 7th monthly fee statement.	0.40	465.00	186.00
07/10/2024	Maribel Fontanez	Research various fee applications.	0.70	465.00	325.50
07/12/2024	Maribel Fontanez	Prepare BM monthly fee statement.	2.00	465.00	930.00
07/17/2024	Lori Seavey	Emails with R. Sainvil regarding Rothschild final fee application hearing (.1); review order on interim compensation re same (.1); emails with Judge Wiles' chambers re judge's recusal (.1); email Judge Jones' chambers regarding scheduling hearing and emails with R. Sainvil regarding provided hearing date (.1).	0.40	465.00	186.00
07/18/2024	Maribel Fontanez	Prepare Dentons fee application.	2.20	465.00	1,023.00
07/22/2024	Lori Seavey	Emails with R. Sainvil and Judge Jones' chambers regarding Rothschild final fee application hearing (.1).	0.10	465.00	46.50
07/23/2024	John Dodd	Review draft Rothschild Final Fee Application.	0.80	1,345.00	1,076.00
07/23/2024	Maribel Fontanez	Review retention applications for Rothschild and Kroll; communicate with R.	0.20	465.00	93.00



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/25/2024	Maribel Fontanez	Sainvil regarding same. Commence preparing GSX first and final fee application.	2.40	465.00	1,116.00
07/29/2024	Lori Seavey	Emails with R. Sainvil regarding Rothschild final fee application (.2); revise Rothschild fee application for filing (.3); prepare notice of hearing for Rothschild's final fee application (.4); telephone call with R. Sainvil regarding revisions to Rothschild fee application (.1); revisions to same and finalize and file (.5); emails to Baker team, Judge Jones' chambers and Kroll re filing (.1).	1.60	465.00	744.00

**B190-Other Contested Matters**

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/01/2024	Paul Keenan	Correspondence with RESOR and analysis of pending WHOA issues.	0.50	1,645.00	822.50
07/01/2024	Thais Barboza	Daily analysis of the updated court records in order to verify possible measures to be taken on it, as requested by M. Conrado.	0.20	335.00	67.00
07/02/2024	Thais Barboza	Daily analysis of the updated court records in order to verify possible measures to be taken on it, as requested by M. Conrado.	0.20	335.00	67.00



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/03/2024	Paul Keenan	Numerous correspondence and analysis regarding status of matters in Brazil.	0.50	1,645.00	822.50
07/03/2024	Thais Barboza	Daily analysis of the updated court records in order to verify possible measures to be taken on it, as requested by M. Conrado.	0.20	335.00	67.00
07/04/2024	Paul Keenan	Numerous correspondence and analysis regarding status of WHOA proceeding.	0.40	1,645.00	658.00
07/04/2024	Thais Barboza	Daily analysis of the updated court records in order to verify possible measures to be taken on it, as requested by M. Conrado.	0.20	335.00	67.00
07/05/2024	Paul Keenan	Numerous correspondence regarding WHOA proceeding and effective date conditions.	0.40	1,645.00	658.00
07/05/2024	Thais Barboza	Daily analysis of the updated court records in order to verify possible measures to be taken on it, as requested by M. Conrado.	0.30	335.00	100.50
07/08/2024	Paul Keenan	Conference call with Resor, Observer and Baker team, and follow up regarding same.	0.80	1,645.00	1,316.00
07/08/2024	Paul Keenan	Conference with RESOR and Baker	0.50	1,645.00	822.50



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/09/2024	Paul Keenan	team in preparation for call with Observer. Conference call with M Bloom regarding status of WHOA proceeding.	0.30	1,645.00	493.50
07/09/2024	Thijs Bogaers	Acquire3 and circulate an up-to-date Trade Register extract of Mercon B.V.	0.30	613.37	184.01
07/10/2024	Thais Barboza	Daily analysis of the updated court records in order to verify possible measures to be taken on it, as requested by M. Conrado.	0.20	335.00	67.00
07/11/2024	Thais Barboza	Daily analysis of the updated court records in order to verify possible measures to be taken on it, as requested by M. Conrado.	0.20	335.00	67.00
07/12/2024	Thais Barboza	Daily analysis of the updated court records in order to verify possible measures to be taken on it, as requested by M. Conrado.	0.30	335.00	100.50
07/12/2024	Thijs Bogaers	Review and edit the draft board resolution of Mercon B.V. granting a proxy to negotiate and enter into Settlement Agreements on behalf of the Company, includes correspondences with Resor Team and Baker US Team.	0.60	613.37	368.02
07/15/2024	Thais Barboza	Daily analysis of the updated court records	0.20	335.00	67.00



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/16/2024	Thais Barboza	in order to verify possible measures to be taken on it, as requested by M. Conrado. Daily analysis of the updated court records	0.20	335.00	67.00
07/17/2024	Thais Barboza	in order to verify possible measures to be taken on it, as requested by M. Conrado. Daily analysis of the updated court records	0.20	335.00	67.00
07/18/2024	Thais Barboza	in order to verify possible measures to be taken on it, as requested by M. Conrado. Daily analysis of the updated court records	0.20	335.00	67.00
07/19/2024	Thais Barboza	in order to verify possible measures to be taken on it, as requested by M. Conrado. Daily analysis of the updated court records	0.20	335.00	67.00
07/20/2024	Paul Keenan	Multiple correspondence with Resor regarding court ruling and next steps in WHOA.	0.40	1,645.00	658.00
07/22/2024	Thais Barboza	Daily analysis of the updated court records in order to verify possible measures to be taken on it, as requested by M. Conrado.	0.20	335.00	67.00





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07/23/2024	Thais Barboza	Daily analysis of the updated court records in order to verify possible measures to be taken on it, as requested by M. Conrado.	0.20	335.00	67.00
07/23/2024	Thijs Bogaers	Review the corporate documents related to Mercon Coop and Mercon B.V. as received from DLA Piper, includes sharing said documents with client.	0.40	613.35	245.34
07/24/2024	Paul Keenan	Correspondence and analysis regarding assets and liabilities of Mercon BV and WHOA proceeding and possible dissolution under Dutch law.	0.40	1,645.00	658.00
07/24/2024	Thais Barboza	Daily analysis of the updated court records in order to verify possible measures to be taken on it, as requested by M. Conrado.	0.20	335.00	67.00
07/25/2024	Thais Barboza	Daily analysis of the updated court records in order to verify possible measures to be taken on it, as requested by M. Conrado.	0.20	335.00	67.00
07/26/2024	Thais Barboza	Daily analysis of the updated court records in order to verify possible measures to be taken on it, as requested by M. Conrado.	0.20	335.00	67.00
07/29/2024	Thais Barboza	Daily analysis of the	0.20	335.00	67.00



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/30/2024	Thais Barboza	updated court records in order to verify possible measures to be taken on it, as requested by M. Conrado. Daily analysis of the updated court records in order to verify possible measures to be taken on it, as requested by M. Conrado.	0.20	335.00	67.00
07/31/2024	Thais Barboza	Daily analysis of the updated court records in order to verify possible measures to be taken on it, as requested by M. Conrado.	0.20	335.00	67.00

**B220-Employee Benefits/Pensions**

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/24/2024	Lori Seavey	Research precedent re KERP motions (.5); emails with R. Sainvil re same (.1).	0.60	465.00	279.00

**B230-Financing/Cash Collateral**

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/08/2024	John Dodd	Call with M. Schofield regarding Cash Collateral Budget (.4); follow up calls with M. Schofield regarding same (.1); review and comment on multiple iterations of revised Cash Collateral Budget (.4).	0.90	1,345.00	1,210.50
07/09/2024	John Dodd	Call with I. Bagby and A. Greenberg regarding Cash Collateral Budget (.5);	0.70	1,345.00	941.50



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07/10/2024	John Dodd	call with H. Light regarding same (.2). Multiple correspondence regarding Cash Collateral Budget.	0.20	1,345.00	269.00
07/11/2024	John Dodd	Call with H. Light regarding Cash Collateral Budget.	0.20	1,345.00	269.00
07/15/2024	John Dodd	Call Harve and Reggie UST Fees, Effectiveness of Plan, Cash Collateral Budget (.5); follow up call with Reggie regarding same (.1).	0.60	1,345.00	807.00

**B320-Plan and Disclosure Statement**

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/01/2024	Dionna Shear	Conduct follow up research on Section 503(c) cases for supplemental brief in support of Debtor Releases.	1.00	1,060.00	1,060.00
07/01/2024	James Gilmore	Conduct Second Circuit and nation-wide research regarding what constitutes "transfer," "obligation," "property," "interest of property," or "compensation" under section 503(c) of the Bankruptcy Code.	4.90	825.00	4,042.50
07/01/2024	John Dodd	Review correspondence from UST regarding Liquidating Trust Agreement (.2); respond regarding same (.1); call with M. Bloom analyze Estate Release issues (.5);	2.50	1,345.00	3,362.50



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07/01/2024	Mark Bloom	review plan provisions regarding Professional Fee Escrow Account (.2); call with H. Light regarding same (.2); review and comment regarding initial draft of Supplemental Brief concerning Estate Releases (1.3). Followup on Chapter 11 Plan status and WHOA Plan, 503c and Plan release issue, including selective review of confirmation hearing transcript (.4) and revision of draft submission to JWiles (1.6), and exchange of multiple emails regarding all of foregoing (.9).	2.90	1,645.00	4,770.50
07/01/2024	Michael Matthiesen	Telephone conference with R. Sainvil regarding Section 503c of the bankruptcy code and case law regarding whether settlements are a form of compensation (.5); research and analysis regarding same (2.1); finalize anaylsis regarding the application of Section 503c to debtor's settlements (1.2); email correspondence with R. Sainvil regarding same (.3).	4.10	670.00	2,747.00
07/01/2024	Paul Keenan	Additional conference with management team regarding status	0.50	1,645.00	822.50



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07/01/2024	Paul Keenan	of confirmation of plan and effective date. Analysis of and revisions to supplemental confirmation brief requested by the court.	0.70	1,645.00	1,151.50
07/01/2024	Paul Keenan	Initial conference with liquidating trustee and follow up regarding requests from same.	1.30	1,645.00	2,138.50
07/01/2024	Paul Keenan	Conferences with management team regarding status of confirmation and next steps (.5); follow up regarding same (.4).	0.90	1,645.00	1,480.50
07/01/2024	Paul Keenan	Conferences with Baker team regarding status of confirmation and next steps (.7); and follow up regarding same (3).	1.00	1,645.00	1,645.00
07/01/2024	Paul Keenan	Numerous correspondence and analysis regarding research into 503(c) raised by court.	1.40	1,645.00	2,303.00
07/01/2024	Paul Keenan	Analysis of transcript from confirmation hearing.	0.50	1,645.00	822.50
07/01/2024	Paul Keenan	Analysis of calendar deadlines and milestones for effective date.	0.30	1,645.00	493.50
07/01/2024	Reginald Sainvil	Analyze and revise memorandum of law in support of releases.	4.50	1,195.00	5,377.50
07/01/2024	Reginald Sainvil	Analyze case law regarding application of section 503(c) of the Bankruptcy Code to debtor or estate releases.	3.60	1,195.00	4,302.00



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07/02/2024	Blaire Cahn	Reviewing revised 503 brief.	0.50	1,345.00	672.50
07/02/2024	John Dodd	Review draft Supplemental Brief on Estate Releases (.4); revise draft Supplemental Brief on Estate Releases (1).	1.40	1,345.00	1,883.00
07/02/2024	Lori Seavey	Receive J. Dodd and B. Cahn comments to supplemental brief; circulate to Baker team; (.2).	0.20	465.00	93.00
07/02/2024	Maribel Fontanez	Insert table of contents into supplemental brief.	1.00	465.00	465.00
07/02/2024	Mark Bloom	Final review of & revision of draft Supplemental Brief on Releases (1.1), and exchange of multiple emails regarding same (.4).	1.50	1,645.00	2,467.50
07/02/2024	Paul Keenan	Numerous correspondence and analysis regarding 503 (c) requirement and other issues raised by court for confirmation.	0.80	1,645.00	1,316.00
07/02/2024	Paul Keenan	Close analysis of supplemental confirmation brief and revising same (.8); analysis of statutes and case law in support of same (.5).	1.30	1,645.00	2,138.50
07/02/2024	Reginald Sainvil	Continue drafting and revising supplemental memorandum of law in support of debtor releases.	3.40	1,195.00	4,063.00
07/03/2024	Blaire Cahn	Reviewing 503(c) supplemental issues (.4).	0.40	1,345.00	538.00
07/03/2024	John Dodd	Review Judge Glenn	0.50	1,345.00	672.50



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		decision regarding section 503(c) and analyze whether to file Notice of Supplemental Authority regarding 503(c) and Plan Releases.			
07/03/2024	Maribel Fontanez	Draft letter to judge regarding releases; communicate with R. Sainvil regarding same.	0.50	465.00	232.50
07/03/2024	Mark Bloom	Analysis and assessment of Plan and Confirmation Order on assets of foreign debtors, and exchange of emails with HLlight, Krijn regarding Dutch WHOA and Brazil ancillary case (.5); review of 2 July JGlenn 503c decision just released in Gol Lineas, and drafting of correspondence to JWiles regarding same as supplemental authority (.7).	1.20	1,645.00	1,974.00
07/03/2024	Paul Keenan	Numerous correspondence with trustee and others regarding tasks to be completed for effective date.	0.70	1,645.00	1,151.50
07/03/2024	Paul Keenan	Finalizing supplemental confirmation brief for filing.	0.80	1,645.00	1,316.00
07/03/2024	Paul Keenan	Conference with J Dodd regarding next steps for confirmation and effective date.	0.40	1,645.00	658.00



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07/03/2024	Reginald Sainvil	Analyze recent SDNY case rejecting broad application of section 503(c) and prepare letter brief to supplement memorandum of law in support of debtor releases.	2.70	1,195.00	3,226.50
07/07/2024	Reginald Sainvil	Analyze and revise escrow agreement.	0.40	1,195.00	478.00
07/08/2024	John Dodd	Call with R. Sainvil regarding status post-Confirmation Hearing (.2); Call with P. Keenan regarding Estate Release issues and next steps (.3).	0.50	1,345.00	672.50
07/08/2024	Mark Bloom	Preparation for (.2) & participation in telephone conferences with HLight & RESOR (.5), Observer (.5) regarding WHOA Plan, Chapter 11 Plan status, implementation and related issues.	1.20	1,645.00	1,974.00
07/08/2024	Paul Keenan	Conference with J Dodd regarding next steps in confirmation of plan.	0.30	1,645.00	493.50
07/08/2024	Paul Keenan	Numerous correspondence regarding turnover to trustee.	0.70	1,645.00	1,151.50
07/09/2024	Reginald Sainvil	Analyze revisions to liquidating trust agreement.	0.50	1,195.00	597.50
07/10/2024	Paul Keenan	Conference with R. Weber regarding going effective on plan and duties of trust.	0.50	1,645.00	822.50
07/10/2024	Paul Keenan	Numerous correspondence	0.50	1,645.00	822.50





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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/11/2024	John Dodd	regarding matters to to turn over to liquidating trustee and conditions to effectiveness of plan. Review UCC and UST Supplemental Statements in connection with Plan Confirmation.	0.30	1,345.00	403.50
07/11/2024	Paul Keenan	Conference with CRO regarding plan conformation issues.	0.20	1,645.00	329.00
07/11/2024	Reginald Sainvil	Analyze response of the UST and outline factors distinguishing present facts.	2.40	1,195.00	2,868.00
07/15/2024	Paul Keenan	Numerous correspondence and analysis regarding upcoming deadlines and effective date of plan, status of WHOA proceedings, status of Brazilian proceedings.	1.20	1,645.00	1,974.00
07/16/2024	Mark Bloom	Contingency planning for 503c ruling and impact on confirmation process, and telephone conference with JDodd re advice on same.	0.20	1,645.00	329.00
07/17/2024	John Dodd	Review materials relating to Budget and Flow of Funds upon Chapter 11 Plan Effective Date (.6); call with H. Light regarding same (.3); review multiple correspondence with proposed Liquidation Trustee regarding same (.1).	1.00	1,345.00	1,345.00



**Matter Number:** 51171831  
**Invoice Number:** 9656089486  
**Invoice Due Date:** Payable in 30 days

August 30, 2024

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/17/2024	Reginald Sainvil	Analyze issues related to anticipated transition from Debtors to Liquidating Trust.	2.10	1,195.00	2,509.50
07/19/2024	John Dodd	Initial review of memorandum opinion regarding confirmation of Chapter 11 Plan (.3); call with P. Keenan regarding same (.3).	0.60	1,345.00	807.00
07/19/2024	Mark Bloom	Review of JWiles opinion on Plan releases and 503(c) (.5); exchange of internal emails regarding analysis and potential options (.4).	0.80	1,645.00	1,316.00
07/19/2024	Paul Keenan	Drafting revised plan provisions to comply with instructions of the court.	0.50	1,645.00	822.50
07/19/2024	Paul Keenan	Conference with J Dodd regarding interpretation of court ruling.	0.30	1,645.00	493.50
07/19/2024	Paul Keenan	Conference with CRO regarding interpretation of court ruling.	0.30	1,645.00	493.50
07/19/2024	Paul Keenan	Outlining responses to requests from court on further information for confirmation of plan.	1.10	1,645.00	1,809.50
07/19/2024	Paul Keenan	Analysis of interim ruling by court and outlining responses to same.	1.20	1,645.00	1,974.00
07/19/2024	Reginald Sainvil	Analyze written opinion regarding objections by the US Trustee to confirmation of the Debtors' Fourth	3.10	1,195.00	3,704.50



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/20/2024	John Dodd	Amended Plan of Liquidation and consider potential plan modifications. Call with I. Bagby and A. Greenberg regarding confirmation opinion and next steps for confirmation (.5); call with P. Keenan and B. Cahn regarding confirmation memorandum opinion and chapter 11 plan revisions (.4); review materials regarding same (.4).	1.30	1,345.00	1,748.50
07/20/2024	Paul Keenan	Numerous correspondence regarding turnover of D&O material to trustee.	0.60	1,645.00	987.00
07/20/2024	Paul Keenan	Numerous correspondence with J Dodd and R Sainvil regarding terms of revised confirmation order to comply with court ruling.	0.90	1,645.00	1,480.50
07/20/2024	Paul Keenan	Close analysis of court's ruling on motion to confirm plan and objections to same.	0.80	1,645.00	1,316.00
07/20/2024	Paul Keenan	Multiple correspondence regarding court's ruling on motion for plan confirmation.	0.40	1,645.00	658.00
07/20/2024	Paul Keenan	Drafting and revising release language to comply with court ruling.	0.80	1,645.00	1,316.00
07/20/2024	Reginald Sainvil	Prepare revised plan	3.80	1,195.00	4,541.00



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August 30, 2024

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/20/2024	Reginald Sainvil	and confirmation order to conform with Court's ruling. Prepare lists of insiders, released employees, and non-insiders.	1.20	1,195.00	1,434.00
07/21/2024	Paul Keenan	Numerous correspondence and analysis regarding revised confirmation order to comply with court's ruling.	1.30	1,645.00	2,138.50
07/21/2024	Paul Keenan	Analysis of and revisions to revised proposed confirmation order.	0.80	1,645.00	1,316.00
07/22/2024	John Dodd	Review and analyze confirmation memorandum opinion (1); review and comment on revisions to proposed form of Confirmation Order to address memorandum opinion (.5); multiple correspondence with P. Keenan and R. Sainvil regarding same (.2); call with R. Sainvil regarding same (.1); call with R. Sainvil regarding Rabo Bank comments to same (.2); calls and correspondence with M. Bloom regarding memorandum opinion (.3).	2.30	1,345.00	3,093.50
07/22/2024	Mark Bloom	Further analysis of 503(c) decision and planning for further steps to confirmation.	0.60	1,645.00	987.00
07/22/2024	Paul Keenan	Conference with shareholder regarding	0.90	1,645.00	1,480.50



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/22/2024	Paul Keenan	status of plan confirmation. Conference with R Sainvil regarding next steps in plan confirmation.	0.20	1,645.00	329.00
07/22/2024	Paul Keenan	Numerous correspondence and analysis in response to court's interim ruling on motion to confirm plan and objections to same.	0.80	1,645.00	1,316.00
07/22/2024	Paul Keenan	Correspondence and analysis for revisions to confirmation order after court's ruling on same.	0.70	1,645.00	1,151.50
07/22/2024	Paul Keenan	Numerous correspondence regarding closing of matters for debtors and transfer to liquidating trust.	0.50	1,645.00	822.50
07/22/2024	Reginald Sainvil	Prepare analysis regarding grounds in support of non-insider status of each released employee.	3.50	1,195.00	4,182.50
07/23/2024	John Dodd	Analyze memorandum opinion regarding proposed edits to estate releases and potential justifications therefor (.5); correspond with Baker R&I team regarding proposed edits to draft form of Confirmation Order (.2).	0.70	1,345.00	941.50
07/23/2024	Maribel Fontanez	Review confirmation hearing transcript with regards to Category 1 releases; communicate	0.30	465.00	139.50



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/23/2024	Mark Bloom	with R. Sainvil regarding same. Internal advice concerning resolution of JWiles 503c concern for confirmation of Plan.	0.60	1,645.00	987.00
07/23/2024	Paul Keenan	Conference with R Sainvil regarding confirmation issues.	0.20	1,645.00	329.00
07/23/2024	Reginald Sainvil	Prepare further revisions to the proposed confirmation order to incorporate changes required by opinion issued by the Court.	1.80	1,195.00	2,151.00
07/24/2024	Mark Bloom	Further planning for Plan confirmation after 503c decision on releases.	0.30	1,645.00	493.50
07/24/2024	Paul Keenan	Correspondence and analysis with R Sainvil regarding UST request to changes to confirmation order.	0.70	1,645.00	1,151.50
07/24/2024	Reginald Sainvil	Prepare further analysis and detail to support list of non-insiders.	1.50	1,195.00	1,792.50
07/25/2024	Reginald Sainvil	Analyze contract assumption issues and consider plan supplement revisions.	2.80	1,195.00	3,346.00
07/26/2024	Paul Keenan	Correspondence and analysis with R Sainvil regarding revisions to confirmation order and continued objections of US trustee.	0.60	1,645.00	987.00
07/26/2024	Paul Keenan	Conference with management team member regarding status of plan	0.50	1,645.00	822.50



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/26/2024	Paul Keenan	confirmation and interpretation of court's ruling. Correspondence and analysis regarding revisions to liquidating trust.	0.30	1,645.00	493.50
07/26/2024	Reginald Sainvil	Analyze revisions to liquidating trust agreement and coordinate resolution of issues arising from convenience claim distribution as described in the Plan.	1.70	1,195.00	2,031.50
07/26/2024	Reginald Sainvil	Analyze proposed 107 order as modified by the UST.	0.40	1,195.00	478.00
07/29/2024	Lori Seavey	Emails with R. Sainvil regarding Judge Wiles' edited Confirmation order (.1).	0.10	465.00	46.50
07/29/2024	Mark Bloom	Review of Confirmation Order and reconciliation with 503c Order.	0.20	1,645.00	329.00
07/29/2024	Reginald Sainvil	Prepare for and attend hearing regarding resolution of the remaining debtor release issue.	1.60	1,195.00	1,912.00
07/30/2024	Lori Seavey	Emails with R. Sainvil regarding exhibits for final confirmation order (.2); prepare final plan and liquidating trust for email to chambers (.2); review entered confirmation order and email Baker team re same (.1); review Local Rules and email to Kroll regarding service of same (.1);	0.90	465.00	418.50



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/30/2024	Reginald Sainvil	further review of order and emails with R. Sainvil and M. Fontanez re related obligations and deadlines re same (.3). Prepare analysis regarding requisite actions for occurrence of the effective date of the chapter 11 plan.	1.60	1,195.00	1,912.00
07/30/2024	Reginald Sainvil	Analyze final confirmation order and confirmed plan of liquidation.	0.90	1,195.00	1,075.50
07/31/2024	John Dodd	Review and comment on final steps for Chapter 11 Plan Effective Date (.3); call with H. Light, M. Schofield, and R. Sainvil regarding Effective Date matters (.3).	0.60	1,345.00	807.00
07/31/2024	Reginald Sainvil	Numerous correspondence with Riveron, UCC, and Rabobank regarding compliance with prerequisites to occurrence of the effective date.	1.60	1,195.00	1,912.00
<b>Total Hours: 172.20</b>			<b>Total:</b>	<b>197,966.37 USD</b>	





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August 30, 2024

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## Time Summary

### B100-Administration

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Federico Cuadra Del Carmen	6.00	1,345.00	8,070.00
<b>Total</b>	<b>B100-Administration</b>		<b>8,070.00</b>

### B110-Case Administration

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
John Dodd	0.40	1,345.00	538.00
Lori Seavey	3.90	465.00	1,813.50
Mariana Conrado	0.70	545.00	381.50
Maribel Fontanez	7.40	465.00	3,441.00
Paul Keenan	7.90	1,645.00	12,995.50
<b>Total</b>	<b>B110-Case Administration</b>		<b>19,169.50</b>

### B130-Asset Disposition

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Annika Thorelli	2.20	470.00	1,034.00
Federico Cuadra Del Carmen	0.20	1,345.00	269.00
Ronald Ohren	0.50	1,270.00	635.00
Zachary Bassen	6.90	750.00	5,175.00
<b>Total</b>	<b>B130-Asset Disposition</b>		<b>7,113.00</b>

### B150-Meetings of and Communications with Creditors

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Paul Keenan	0.70	1,645.00	1,151.50
<b>Total</b>	<b>B150-Meetings of and Communications with Creditors</b>		<b>1,151.50</b>

### B160-Fee/Employment Applications

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
John Dodd	0.80	1,345.00	1,076.00
Lori Seavey	2.10	465.00	976.50
Maribel Fontanez	10.80	465.00	5,022.00
<b>Total</b>	<b>B160-Fee/Employment Applications</b>		<b>7,074.50</b>

### B190-Other Contested Matters



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August 30, 2024

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Paul Keenan	4.20	1,645.00	6,909.00
Thais Barboza	4.40	335.00	1,474.00
Thijs Bogaers	1.30	613.36	797.37
<b>Total</b>	<b>B190-Other Contested Matters</b>		<b>9,180.37</b>

**B220-Employee Benefits/Pensions**

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Lori Seavey	0.60	465.00	279.00
<b>Total</b>	<b>B220-Employee Benefits/Pensions</b>		<b>279.00</b>

**B230-Financing/Cash Collateral**

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
John Dodd	2.60	1,345.00	3,497.00
<b>Total</b>	<b>B230-Financing/Cash Collateral</b>		<b>3,497.00</b>

**B320-Plan and Disclosure Statement**

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Blaire Cahn	0.90	1,345.00	1,210.50
Dionna Shear	1.00	1,060.00	1,060.00
James Gilmore	4.90	825.00	4,042.50
John Dodd	11.70	1,345.00	15,736.50
Lori Seavey	1.20	465.00	558.00
Maribel Fontanez	1.80	465.00	837.00
Mark Bloom	9.50	1,645.00	15,627.50
Michael Matthiesen	4.10	670.00	2,747.00
Paul Keenan	28.40	1,645.00	46,718.00
Reginald Sainvil	45.10	1,195.00	53,894.50
<b>Total</b>	<b>B320-Plan and Disclosure Statement</b>		<b>142,431.50</b>

**Total Hours 172.20 Total Fees 197,966.37 USD**

**Exhibit F**

**Budget for Staffing Plan for Second Interim Compensation Period**

**BUDGETED AND ACTUAL FEES AND EXPENSES**

The Budget set forth below reflects anticipated fees for Baker McKenzie in connection with work performed for the Debtors. Baker McKenzie discussed its rates, fees, and staffing with the Debtors at the outset of, and throughout, these Chapter 11 Cases.

<b>TASK CODE</b>	<b>PROJECT CATEGORY</b>	<b>ESTIMATED HOURS BILLED</b>	<b>ESTIMATED AMOUNT</b>	<b>TOTAL HOURS BILLED</b>	<b>AMOUNT</b>
<b>B100</b>	Administration	50.00	\$50,000.00	153.00	\$204,201.00
<b>B110</b>	Case Administration	50.00	\$50,000.00	175.10	\$166,824.00
<b>B120</b>	Asset Analysis Recovery	75.00	\$75,000.00	17.20	\$19,349.50
<b>B130</b>	Asset Disposition	100.00	\$100,000.00	547.50	\$432,512.76
<b>B140</b>	Relief From Stay /Adequate Protection	15.00	\$15,000.00	13.40	\$15,340.00
<b>B150</b>	Meetings and Communications w/Creditors	10.00	\$10,000.00	3.20	\$4,910.00
<b>B160</b>	Fee/Employment Applications	10.00	\$10,000.00	104.50	\$54,542.50
<b>B170</b>	Fee/Employment Objections	0.00	0.00	1.50	\$697.50
<b>B185</b>	Assumption/Rejection of Leases and Contracts	10.00	\$10,000.00	6.60	\$5,624.85
<b>B190</b>	Other Contested Matters	500.00	\$500,000.00	116.00	\$107,489.87
<b>B195</b>	Non-Working Travel (Billed at 50% Rate)	20.00	\$20,000.00	23.50	\$18,293.75
<b>B210</b>	Business Operations	10.00	\$10,000.00	11.10	\$12,361.50

<b>TASK CODE</b>	<b>PROJECT CATEGORY</b>	<b>ESTIMATED HOURS BILLED</b>	<b>ESTIMATED AMOUNT</b>	<b>TOTAL HOURS BILLED</b>	<b>AMOUNT</b>
<b>B220</b>	Employee Benefits / Pensions	10.00	\$10,000.00	4.40	\$1,200.00
<b>B230</b>	Financing / Cash Collections	25.00	\$25,000.00	31.40	\$42,669.00
<b>B240</b>	Tax Issues	25.00	\$25,000.00	16.80	\$9,233.50
<b>B260</b>	Board of Directors Matters	30.00	\$30,000.00	8.10	\$4,037.12
<b>B300</b>	Claims and Plan	150.00	\$150,000.00	0.00	\$0.00
<b>B310</b>	Claims Administration and Objections	50.00	\$50,000.00	11.00	\$13,208.00
<b>B320</b>	Plan & Disclosure Statement	900.00	\$900,000.00	995.40	\$1,245,740.50
<b>B400</b>	Bankruptcy Related Advise	25.00	\$25,000.00	5.30	\$2,681.65
<b>B410</b>	General Bankruptcy Advice/Opinions	25.00	\$25,000.00	64.00	\$46,015.59
<b>B420</b>	Restructurings	10.00	\$10,000.00	0.00	\$0.00
<b>Total:</b>		<b>2,100.00</b>	<b>\$2,100,000.00</b>	<b>2,309.00</b>	<b>\$2,406,932.59</b>

### **STAFFING PLAN**

Baker McKenzie discussed attorney staffing with the Chief Restructuring Officer of the Debtors throughout the Final Compensation Period. The bankruptcy attorneys primarily responsible for representing the Debtors in connection with these Chapter 11 Cases are Paul Keenan and Reginald Sainvil. Federico Cuadra del Carmen is the corporate attorney primarily responsible for documenting the asset sale transactions. When appropriate, they are assisted by other attorneys in the transactional and litigation departments.

**Exhibit G**

**Summary and Comparison of Blended Rates**

**Customary and Comparable Compensation  
Disclosures for Work Performed for the Debtors**

Category of Timekeeper	Blended Hourly Rate	
	Billed by timekeepers in the New York and Miami offices, excluding bankruptcy <sup>1</sup>	Billed in this Fee Application
Partner	\$1,211.04	\$1,374.89
Counsel	\$1,157.34	\$1,087.19
Associate	\$777.05	\$886.27
Law Clerks	\$574.47	\$426.02 <sup>2</sup>
Paralegal	\$385.57	\$460.94
Other	\$347.82	\$405.71
<b>All timekeepers aggregated</b>	<b>\$935.77</b>	<b>\$1,062.31</b>

<sup>1</sup> In accordance with the *Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases*, effective November 1, 2013, preceding year is a rolling 12 month year ending July 31, 2024; blended rates reflect work performed in preceding year in the New York Office, excluding all data from bankruptcy law matters.

<sup>2</sup> Includes Summer Associate, Law Clerks, and Trainee.

**Exhibit H**

**Summary of Expenses  
[Second Interim Period]**

<b>EXPENSE CATEGORY</b>	<b>TOTAL</b>
Airfare	\$1,840.65
Apostille Fees	\$2,131.35
Certified Copies	\$0.00
Computer Research	\$2,311.23
Copies	\$50.65
Courier/Messenger	\$814.74
CourtSolutions	\$1,260.00
Documents – Brazil	\$0.00
E-Discovery	\$200.00
Filing Fees	\$2,386.90
In-Flight Wi-Fi	\$0.00
Lien Search / Searches	\$0.00
Lodging	\$7,620.13
Meals	\$269.45
Outside Document Production	\$1,556.55
Parking	\$50.00
Transcripts	\$246.20
Translation	\$716.52
Transportation	\$2,334.14
VAT Charges for Vietnam	\$4,866.16
<b>Total:</b>	<b>\$28,654.67</b>



**Exhibit H**

**Summary of Expenses  
[Final Period]**

<b>EXPENSE CATEGORY</b>	<b>TOTAL</b>
Airfare	\$9,220.36
Apostille Fees	\$2,879.35
Certified Copies	\$320.70
Computer Research	\$5,077.87
Copies	\$50.65
Courier/Messenger	\$1,046.02
CourtSolutions	\$3,570.00
Documents – Brazil	\$4,115.62
E-Discovery	\$1,221.72
Filing Fees	\$22,304.90
In-Flight Wi-Fi	\$116.00
Lien Search / Searches	\$1,302.00
Lodging	\$17,632.42
Meals	\$1,730.27
Outside Document Production	\$1,556.55
Parking	\$194.00
Transcripts	\$841.20
Translation	\$747.54
Transportation	\$5,534.08
VAT Charges for Vietnam	\$11,879.22
<b>Total:</b>	<b>\$91,340.47</b>

**Exhibit I**

**Expense Records for Second Interim Compensation Period**



**Matter Number:** 51171831  
**Invoice Number:** 9656067936  
**Invoice Due Date:** Payable in 30 days

June 07, 2024

## Disbursement Summary

<u>Description</u>	<u>Amount</u>
Embassy 2074470 - Legalization - KTA	125.72
Embassy 2074470 - Legalization - KTA	75.05
Embassy 2073584 - Legalization - KTA	221.09
Embassy 2073584 - Legalization - KTA	133.01
Embassy 2074057 - Legalization - KTA	127.49
Embassy 2074057 - Legalization - KTA	110.55
E-Discovery - April - 24 Monthly Host Fee (0-3.5 GBs)	50.00
Mercon Meeting Lunch 4.16.24 - Vendor Blake & Todd	171.99
Dinner at Hotel for P. Keenan's attendance at Court hearing on 04.16.2024.	39.97
Telephonic appearance of F. Cuadra del Carmen at 04.16.2024 hearing	70.00
Court Filing Fee on 4/9/2024 re: Mercon - Sale Motion - Reginald Sainvil.	199.00
CourtSolutions re: Mercon's Telephonic Attendance of Reginald Sainvil at Court Hearing on 4/16/2024.	70.00
Appearance at telephonic hearing on 04.03.2024 for M. Schofield	70.00
Appearance at telephonic hearing on 04.03.2024 for P. Keenan	70.00
Appearance at telephonic hearing on 04.03.2024 for M. Marambio Clavo	70.00
Appearance at telephonic hearing on 04.03.2024 for F. Cuadra del Carmen	70.00
CourtSolutions - Attendance of Reginald Sainvil at Mercon's Telephonic Hearing on 3-20-24.	70.00
John Dodd Court Solutions telephonic appearance at 4/3/24 hearing.	70.00
CourtSolutions re: Attendance of Federico Cuadra del Carmen at Mercon's Telephonic Hearing on 3/20/2024.	70.00
CourtSolutions re: Attendance of Paul Keenan at Mercon's Telephonic Hearing on 3/20/2024.	70.00
CORPORATION SERVICE COMPANY CSC,81116240479 FL / Vietnam - Apostlle and Legalization on Affidavit of Luis Chamorro	414.00
Hotel for P. Keenan's attendance at Court hearing on 04.16.2024.	590.10

**Baker  
McKenzie.**

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<u>Description</u>	<u>Amount</u>
Taxi from airport to hotel for attendance at hearing/client meeting on 04.16.2024.	63.96
Taxi from office to airport for P. Keenan's attendance at Court hearing on 04.16.2024.	70.55
Parking at airport for P. Keenan's attendance at Court hearing on 04.16.2024.	50.00
WILLIAMS LEA LLC, US004-180049254, Offsite document production for Mercon	1,556.55
<u>Description</u>	<u>Amount</u>
Courier/Messenger Service	262.81
Outside Information Services	251.77
Transportation - Local	36.00
VAT Charges for Vietnam	2,331.14
VAT Charges for Vietnam	64.66
VAT Charges for Colombia	416.18
<b>Total Disbursements</b>	<b>8,061.59 USD</b>



**Matter Number:** 51171831  
**Invoice Number:** 9656067990  
**Invoice Due Date:** Payable in 30 days

June 07, 2024

## Disbursement Summary

<u>Description</u>	<u>Amount</u>
DHL AMSR002243244 - Courier Services - MEF	42.15
Embassy 2075209 - Legalization - MEF	133.82
Embassy 2075209 - Legalization - MEF	216.27
L0001VCH:330323-14/05/24 - TRADUCAO JURAMENTADA INGLES P/PORTUGUES - MERCON - APOSTILLE OF ORDER AUTH REPRESENTATIVE - NF 11304 - PIX67836593000100. - SPO-MFC	41.37
E-Discovery - May - 24 Monthly Host Fee (0-3.5 GBs)	50.00
Copy pages	49.95
Airfare for Reginald Sainvil on 4-16-2024 - Delta 1380, NYC - LaGuardia to FLL re: Attendance at Mercon Hearing.	271.10
Telephonic Appearance of Reginald Sainvil at Mercon 4-3-2024 Hearing.	70.00
CourtSolutions - Telephonic Appearance of Paul Keenan re: Mercon Hearing on 5/8/2024.	70.00
CourtSolutions - Paul Keenan's Telephonic Appearance re: Mercon Hearing on 5/14/2024.	70.00
Court Filing Fee on 5/6/2024 - Mercon Sale Motion.	199.00
Court Filing Fee on 5/6/2024 - Mercon Amended Schedules.	714.00
CourtSolutions - Telephonic Appearance of Reginald Sainvil re: Mercon Hearing on 5/8/2024.	70.00
PACER SERVICE CENTER - 2797442-Q12024 - Court Electronic Records	316.90
PACER SERVICE CENTER - 2797442-Q12024 - Court Electronic Records	35.00
UBER Transportation for Reginald Sainvil on 4-16-2024 from Baker Office in NY to Airport re: Attendance at Mercon Hearing.	117.30
Taxi Transportation for Paul Keenan, From LGA Airport to Hotel on 5-13-24 re: Mercon Hearing on 5/14/2024.	63.43
Transcript from 5/16/24 continued Disclosure Statement hearing - INV#953846 - ESCRIBERS LCC	32.40
UBER Transportation for Reginald Sainvil on 4-16-2024 from FLL Airport to Home re: Attendance at Mercon Hearing.	87.56



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<u>Description</u>	<u>Amount</u>
UBER Transportation for Reginald Sainvil on 4-14-2024 from Home to FLL Airport re: Attendance at Mercon Hearing.	69.92
UBER Transportation from Home to MIA Airport for Paul Keenan on 5/13/24 re: Mercon Hearing on 5/14/2024.	49.07
Alto Transportation from MIA Airport to Home on 5/17/24 for Paul Keenan re: Mercon Hearing in NY.	58.32
<u>Description</u>	<u>Amount</u>
Courier/Messenger Service	220.40
Court Fees	324.39
Courier/Messenger Service	115.49
Transportation - Local	40.00
VAT Charges for Vietnam	1,647.00
<b>Total Disbursements</b>	<b>5,174.84 USD</b>



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August 30, 2024

## Disbursement Summary

<u>Description</u>	<u>Amount</u>
KvK 240366798 Paper excerpt	19.42
DHL AMSR002272518 - Courier Services - THB	31.17
DHL AMSR002303346 - Courier Services - THB	30.93
Embassy 2077920 - Legalization - MEF	143.92
Embassy 2077920 - Legalization - MEF	430.43
NGUYEN HOANG ANH.Mercon Ventures International Corp . B.V- Courier.FEDEX.May24	111.79
Anh Tram - Mercon - Translation fee (Ref No. EST-241220)	25.32
Anh Tram - Mercon - Translation fee (Ref No. EST-241209)	66.97
Anh Tram - Mercon - Translation fee (Ref No. EST-241227)	25.71
Anh Tram - Mercon - Translation fee (Ref No. EST-241244)	2.90
ThiThu.Sucafina-Taxi.Vinasun.May24	4.47
ViVu.Mercon Ventures-Taxi.GRAB.May2024	1.12
ViVu.Mercon Ventures-Taxi.GRAB.May2024	1.67
E-Discovery - June - 24 Monthly Host Fee (0-3.5 GBs)	50.00
Airfare - MIA to LGA on 5/13/24 - AA1389, Ticket #: 17070178516 re: Mercon's Hearing in NY - 5/13-16/2024 for R. Sainvil	92.80
Airfare re: Mercon's Hearing on 5/14/2024 - Attendance of Paul Keenan.	447.00
Airfare - Return Flight LGA to MIA on 5/15/24 - AA1698, Ticket #: 17013918499 re: Mercon's Hearing in NY - 5/13-16/2024 for R. Sainvil	254.23
John Dodd airfare expense to New York on 6/24-28/24 for 341 meeting and confirmation hearing	230.98
John Dodd airfare expense to New York on July 1-3,2024	138.48
Airfare - Ticket Exchange as to Return Flight LGA to MIA on 5/16/24 - AA1698, Ticket #: 17014242710 re: Mercon's Hearing in NY - 5/13-16/2024 for R. Sainvil	112.81
Hotel - Business Meals for Paul Keenan re: NY Trip - Hearing - 5/13-17/2024.	57.49



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<u>Description</u>	<u>Amount</u>
Court Filing Fee on 5-13-2024 - Reginald Sainvil re: Mercon's Second Amended Schedules.	782.00
Court Filing Fee on 5-13-2024 - Reginald Sainvil re: Mercon's Schedules.	34.00
CourtSolutions - Telephonic Hearing on 5/16/2024 - Appearance for Reginald Sainvil re: Mercon.	70.00
CourtSolutions re: Telephonic Appearance of Reginald Sainvil at Mercon's hearing on 5/29/2024.	70.00
CourtSolutions - Attendance for Paul Keenan re: Mercon's Hearing on 5/29/2024.	70.00
Hotel - Lodging for Paul Keenan re: NY Trip - Hearing - 5/13-17/2024.	1,386.75
Hotel - Lodging 5/13-15/2024 re: Mercon's Hearing in NY - 5/13-16/2024.	1,584.12
Hotel - Lodging 5/15-16/2024 re: Mercon's Hearing in NY - 5/13-16/2024.	608.46
John Dodd Uber expense from airport (LGA) to Baker's New York office.	48.39
Amtrak Train Ticket for Paul Keenan on 6/25/2024 re: Attendance at Mercon's Hearing in NY.	147.00
UBER Transportation from Hotel to LGA Airport on 5/17/2024 for Paul Keenan re: Mercon's Hearing in NY.	71.80
UBER Transportation on 5/16/24 - MIA Airport to Home for Reginald Sainvil re: Mercon's Hearing in NY - 5/13-16/2024.	88.07
UBER Transportation on 5/16/24 - Baker NY Office to LGA Airport for Reginald Sainvil re: Mercon's Hearing in NY - 5/13-16/2024.	126.93
UBER Transportation on 5/15/24 - Hotel to Baker NY Office for Reginald Sainvil re: Mercon's Hearing in NY - 5/13-16/2024.	47.62
UBER Transportation on 5/14/24 - Hotel to Baker NY Office for Reginald Sainvil re: Mercon's Hearing in NY - 5/13-16/2024.	40.07
UBER Transportation on 5/14/24 - Airport to Hotel in NY for Reginald Sainvil re: Mercon's Hearing in NY - 5/13-16/2024.	80.89
UBER Transportation from Hotel to Office on 5/16/2024 for Reginald Sainvil re: Mercon's Hearing in NY - 5/13-16/2024.	33.77
UBER Transportation from Airport to Baker NY Office on 5/6/24 for Reginald Sainvil re: Mercon's Hearing in NY.	112.18
PACER 1st Quarter 2024	145.60
ESCRIBERS, LLC - INV 971784 - Transcript of 05/08/2024 Hearing	113.90
UBER Transportation from Home to Airport on 5/6/24 for Reginald Sainvil re: Mercon's Hearing in NY.	92.99





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Description	Amount
UBER Transportation from Airport to Home on 5/8/24 for Reginald Sainvil re: Mercon's Hearing in NY.	89.19
UBER Tip on 5/13/2024 - Home to MIA Airport for Paul Keenan re: Mercon's Hearing in NY.	10.00
UBER Transportation on 5/13/24 - Home to MIA Airport for Reginald Sainvil re: Mercon's Hearing in NY - 5/13-16/2024.	89.36
Description	Amount
Court Fees	134.51
Outside Information Services	1,021.63
Photocopies	0.70
VAT Charges for Vietnam	406.65
Total Disbursements	9,786.19 USD



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August 30, 2024

## Disbursement Summary

<u>Description</u>	<u>Amount</u>
ThiThu.Pacorini-Taxi.Vinasun.Jun24	1.64
ThiThu.Sucafina-Taxi.Vinasun.Jun24	5.02
L0001VCH:332123-02/07/24 - TRADUCAO JURAMENTADA INGLES P/PORTUGUES - PROJETO MERCON COFFEE CORPORATION. NF 7270 - OS 32454. - SPO-MFC	554.25
E-Discovery - July - 24 Monthly Host Fee (0-3.5 GBs)	50.00
Airfare - Outbound, AA Miami (MIA) - New York (JFK) re: Attendance of Reginald Sainvil at Confirmation Hearing in NY 6/23-30/2024.	103.15
Airfare - Return, AA New York (JFK) - Miami (MIA) - re: Attendance of Reginald Sainvil at Confirmation Hearing in NY 6/23-30/2024.	190.10
CourtSolutions - Telephonic Appearance of Federico Cuadra del Carmen at Mercon's Confirmation Hearing - 6/28/2024.	70.00
Hotel - Lodging for Reginald Sainvil 6/23-29/2024	1,539.01
John Dodd lodging expense in New York on 6/24-28/2024 re various client matters.	734.47
Hotel - Lodging for Reginald Sainvil 6/29-30/2024 re: Attendance at Hearings in NY 6/23-30/2024.	457.31
Hotel - Lodging for Paul Keenan re: Attendance at Confirmation Hearing in NY - 6/25-28/2024.	719.91
John Dodd Uber expense from Baker NY office to airport (LGA) following Mercon confirmation hearing.	132.36
John Dodd Uber from Bankruptcy court to Baker NY office following Mercon confirmation hearing, also in the car Paul Keenan and Reggie Sainvil.	126.34
John Dodd Uber from Baker NY office to Bankruptcy Court for Mercon confirmation hearing; also in the car was Reggie Sainvil.	111.72
UBER Transportation for Paul Keenan from Office to Court re: Attendance at Mercon's Hearing - 6/28/2024.	68.67
UBER Transportation for Paul Keenan from Hotel to Penn Station re: Attendance at Mercon's Hearing - 6/28/2024.	23.62
UBER for R. Sainvil from MIA Airport to Home re: Attendance at Hearing in NY 6/23-30/2024.	57.30
UBER for R. Sainvil from Hotel to Airport in NY re: Attendance at Hearing in NY 6/23-30/2024.	65.84



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<u>Description</u>	<u>Amount</u>
ESCRIBERS, LLC, 981307 Transcript of 07.01.2024 Hearing	99.90
<u>Description</u>	<u>Amount</u>
Outside Information Services	520.91
VAT Charges for Vietnam	0.53
Total Disbursements	5,632.05 USD